

9R-98-R5

June 27, 1998

BY FACSIMILE, 202-260-4580, AND FIRST CLASS MAIL

USEPA
Ann Goode, Dir. OCR
401 M. Street, S.W.
MC 1201
Washington, D.C. 20460

Dear Office of Civil Rights, Dir. Ann Goode, et al:

I, (b) (6) Privacy [REDACTED], "Petitioner," am filing this Environmental Injustice Complaint, regarding the Central Wayne Energy Recovery Limited Partnership (CWERLP) waste-to-energy incinerator facility "the Facility," located in Dearborn Heights, Michigan, permitted under PSD Permit 190-95. I filed PSD Appeal 98-1 with the USEPA Environmental Appeals Board, "the Board," postmarked December 29, 1997; that was ultimately dismissed as "untimely" on March 26, 1998. I have 180 days from December 29, 1997 to file this complaint; I do so now.

It is my contention that the permitting and operation of this facility, the CWERLP waste-to-energy facility, involved/involves THREE TYPES OF INJUSTICE/DISCRIMINATION:

1. Primary Injustice/Discrimination,
2. Secondary Injustice/Discrimination, and
3. Tertiary Injustice/Discrimination

that I want the USEPA to look into, make judgement calls about, AND, IF APPROPRIATE, SANCTION THE PERMITTING AND OPERATION OF THE FACILITY, PREFERABLY BY CLOSING THE FACILITY DOWN!

1. PRIMARY INJUSTICE/DISCRIMINATION:

a. There is a disparate proportion of both amount and concentration of atmospheric exposures, generated by the facility, to be borne by the residents of Inkster, Michigan. Inkster res-

idents are characterized as Reasonably Maximally Exposed (RME) Adult Resident(s), and Reasonably Maximally Exposed (RME) Child Resident(s) in the "Screening Multipathway Risk Assessment for the Central Wayne Air Quality and Energy Recovery Project," Revised August 1996, the "revised study," submitted by CWERLP, under Project Manager Tom Barnett, on August 23, 1996. Yet, under RME, the city of Inkster is never mentioned by name; unlike the city of Romulus, which is mentioned pertaining to "Subsistence Farmer," and the cities of Belleville and Orchard Lake are implied in the mention of Belleville Lake, Newburgh Lake, and Orchard Lake, as pertaining to "Recreational Frequent Fisher Population." WHY IS THAT?

b. According to the 1990 Census Bureau, the city of Inkster is comprised of a large black population-62% African American individuals.

c. Since the incinerator facility has been operating as Central Wayne County Sanitation Authority, CWCSA, since approx. 1964, as a municipal waste burner, MWB, wind patterns prevailing and the atmospheric exposures to Inkster residents were well known by CWCSA. When CWCSA began looking for a "White Knight" to save the facility from shutting down, THERE IS POTENTIAL for injustice/discrimination to have occurred at that time. Can the EPA OCR find out if there are any written documents involving the black makeup of Inkster residents, vs. the maximum toxic exposures from the incinerator falling on Inkster residents? Or, are there any written documents involving the political connectedness, or not, of Inkster residents, vs. the relative ease (or difficulty) in getting the go ahead with the new project, project manager,

"White Knight?" Please, EPA OCR, research documents involving discussion between any, and all parties, during THE CRUCIAL TIME, WHEN CWCSA WAS LOOKING FOR A "WHITE KNIGHT!"

Also, during my appeal process and dealings with the Michigan Strategic Fund/Michigan Jobs Commission, MSF/MJC, (the MSF approved the issuance of \$68 million in tax exempt bonds to the Facility-CWERLP or Constellation Energy, Inc., CEI- I'm not sure which) I have requested from Doug Rothwell, a written statement that he played no part in bringing CWERLP, CEI, or D.B. REILLY to the CWCSA FACILITY! I have made a few requests; and as of this date, I have received a denial of a FOIA request, because there exist no such records, but have received no written reply from Doug Rothwell, head of the MJC as to whether he played a part in getting the "White Knight!" (At the MSF Board Meeting on April 22, 1998, in Lansing, Mi., I was ready to ask that question to Doug Rothwell personally, but Mr. Rothwell did not attend that Board meeting, when \$68 million in tax exempt bonds were issued. Someone spoke for Mr. Rothwell, Robert Filka, head of MSF, I believe, at the Board meeting, that Mr. Rothwell played no ~~part~~ as a "White Knight" locator; but I need written documentation to ease my mind. EPA OCR, I hope you will investigate this, also. And, again, investigate the dialogue that took place during any potential process, re: the large black population in Inkster, the maximum impact falling on Inkster residents, the political connectedness of Inkster residents, the ease (or difficulty) in getting a new permit, etc. between anyone and the "White Knight."

If there existed any "damaging" discussion involving Inkster residents, then the permitting/operation of this facility was/is discriminatory and intentional, as the effects of toxic exposure were well known, as the Facility operated as CWCSA since 1964.

d. I also filed UIC Appeal 98-1 against EDS (Environmental Disposal Systems, Inc.); and received information about an (EPA) Agency environmental injustice determination made regarding the EDS UIC permits (that the EDS case should not be classified as an environmental injustice case). Supposedly, the USEPA Region 5 Draft, ("Region 5 Interim Guidelines for Identifying and Addressing a Potential Environmental Justice Case"), was dated October 30, 1997. Coincidentally, October 30, 1997 was the date Mr. Dennis Drake, Chief of MDEQ AQD, approved PSD Permit No. 190-95. Yet, I have received no (EPA) Agency environmental justice determination, regarding the CWERLP case, (and whether, or not, the CWERLP case should be classified as an environmental justice case.)

EPA OCR, please find out if such a determination exists in the Administrative Record of the CWERLP case, as regards to PSD Permit No. 190-95. The October 30, 1997 date would suggest that such an environmental determination exists. If so, WHAT IS IT? WHY HAVE I NOT HEARD ABOUT IT, UNTIL NOW; AS A PERSON WHO FILED PSD APPEAL NO. 98-1? WHAT IMPLICATION EXISTS, AS TO INJUSTICE/DISCRIMINATION?

e. Documentation of all facts cited so far will be sent shortly, by first class mail.

f. I would like to submit comments of Tracey Easthope, of the Ecology Center, made at the July 29, 1997 Public Hearing. Environmental Justice comments are included on page 5, (1-6).

g. It is my contention that demographic analysis for an environmental justice determination, should be tested at this Primary level; with demographic analysis not "diluted" by adding Secondary, or Tertiary levels; or by "...consider(ing) demographic information for all communities potentially impacted," as Attachment D of USEPA Memo, dated October 30, 1997, delineates. EPA OCR, PLEASE DO NOT ALLOW DEMOGRAPHIC INFORMATION TO BE "DILUTED!"

2. SECONDARY INJUSTICE/DISCRIMINATION:

a. All persons, White, Black, or Other Minority, are affected by atmospheric deposition, within an undetermined wide range/radius, of the CWERLP Facility.

b. If Environmental Injustice/Discrimination exists at the Primary level, that also applies to the Secondary level. by association, because we live nearby!

Affected are Newburgh Lake, Belleville Lake, and Orchard Lake, with atmospheric mercury deposition. The 1998 Michigan Fish Advisory states "DO NOT EAT" the fish, for Orchard Lake; and women and children can eat fish "ONE TIME PER MONTH" in Newburgh Lake and Belleville Lake. The permitting/operation of this Facility violates MDEQ AQD "RULE 901," R 336.1901!

By being "good neighbors" to Inkster, are we being punished by the MDEQ/Facility, by having our Lakes poisoned with mercury, and other toxins? This is another form of Injustice/Discrimination: Injustice/Discrimination by Association!!! Because, we in nearby communities, live near Inkster!!!

3. TERTIARY INJUSTICE/DISCRIMINATION:

a. There appears to be a disparate proportion of toxic waste producers/storers (with haulers) locating their place of

business along the SOUTH I-275 corridor, and the EAST-WEST I-94 corridor. What is the exemption with the NORTH I-275 corridor, as far as permits for, and facilities for, toxic waste producers and storers? See the maps I've made entitled "S.E. Michigan's Toxic Waste Trends," "Where the Expensive Homes Are," and "South-east Michigan's ethnic and racial trends."

b. In the past year, in WAYNE COUNTY, we have had three toxic facilities being permitted: 1. Wayne Disposal, Inc. for PCB disposal, permit granted April 14, 1997; 2. CWERLP for a waste-to-energy facility, permit granted December 29, 1997; and Environmental Disposal Systems, Inc. for a COMMERCIAL, Class 1, Toxic, Hazardous/Non-hazardous Waste Injection Well, permitted on April 24, 1998, I believe.

c. AND, DON'T FORGET, METRO AIRPORT IS NEARBY, IN ROMULUS, MICHIGAN, WITH ITS ATTENDANT POLLUTION!

d. What's wrong with attempting to locate these facilities along the NORTHERN CORRIDOR OF I-275? CWERLP, if located elsewhere, say the NORTH I-275 corridor, would likely have been denied because of Rule 901; with politically connected citizens involved that could afford to hire their own attorneys, if need be, to fight the PSD Permit!

So, no, I am not in favor of destroying "greenfields." Many "brownfield" permits, and the three permits I've just described, would not likely survive, if paired with politically-connected, and wealthier, citizen-homeowners. So, the "greenfields" would thrive, the permits would be denied, and our environment would be improved.

IN CONCLUSION: EPA OCR, please look at the three maps I've encl. this letter, and the letter from Tracey Easthope; and investigate

7.

CWCSA, MSF/MJC, the "White Knight" Constellation Energy, Inc., CWERLP, and any persons, facilities (including State of Michigan offices), and officers/supervisors/managers you deem applicable, to see if Environmental Injustice/Discrimination has occurred here; in Inkster first, then in the wide range surrounding the CWERLP Facility, then in Wayne County, proper.

The Grosse Pointes-Clinton Incinerator in Clinton Township is poised to close. Has Tom Barnett contacted (in writing) the Grosse Pointes, which are located in Wayne County, to sign on to the CWERLP Facility? IF NOT, WHY NOT? EPA, OCR, YOU be the Judge! (In case you don't know, the Grosse Pointes, are the wealthiest communities of Wayne County!)

Sincerely,

(b) (6) Privacy

Romulus, Michigan 48174

(b) (6) Privacy

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

AIR QUALITY DIVISION
PO BOX 30250
LANSING MI 48909-7750

October 30, 1997

Dear Interested Party,

I would like to thank you for attending the public hearing on a permit application submitted by Central Wayne Energy Recovery L. P. to the Department of Environmental Quality (Department) asking to modify the company's facility located at 4901 Inkster Road, Dearborn Heights, Michigan. The modifications to the existing municipal waste combustors include the upgrading of the incineration equipment, the addition of the boilers and generators to produce electricity for sale, the addition of new air pollution equipment for the three units, and the reopening of the third unit which has been inoperable.

Pursuant to federal and state requirements, the Department held a 52 day public comment period ending on August 12, 1997 and a public hearing on July 29, 1997, on its proposed conditional approval of the permit. The Department received numerous comments during both the comment period and hearing and has prepared the enclosed Response to Comment Document.

After careful consideration of all the issues, and pursuant to the delegation of authority from the Director of the Department, I have approved Permit No. 190-95. As part of this approval, in consideration of information submitted during the public participation process and subsequent analysis of the information provided, I have revised and added conditions as described in Section II of the Response to Comment Document. The final permit decision shall become effective on December 3, 1997, as required by 40 CFR 124.15 and 124.20.

I believe the changes we made to the permit address the concerns raised by members of the public. They include waste materials separation requirements, establishing citizen drop-off recycling centers for all of the communities served by the Central Wayne facility, more stringent emission limitations for arsenic, cadmium and hexavalent chromium, and revised limits for the emission of carbon monoxide.

As a person who submitted a comment during the comment period, you may be able to appeal this decision according to the procedures contained in 40 CFR 124.19 - Appeal of RCRA, UIC, and PSD permit. This letter is being provided to you as required by provisions of Michigan's PSD Delegation and by 40 CFR 124.17.

Thank you for your input in the review of this project. Attached is a copy of the Response to Public Comment Document and the permit as I have approved it. If you have any questions, please contact either Lynn Fiedler at (517) 373-7087 or Randal Telesz at (517) 373-7089.

Sincerely,

Dennis M. Drake, Chief
Air Quality Division
517-373-7023

Enclosure

DMD:LF:bcw

the expanded facility. Therefore, the Air Quality Division can not deny the permit application based on the lack of need.

Comment:

It was noted that the Department of Environmental Quality, Geological Survey Division denied Environmental Disposal Systems, Inc.'s permit application for a second injection waste well based solely on the lack of need.

Air Quality Division Response:

Section 62509(1) of Part 625 of Act 451 states, in part: "...The Supervisor of Mineral Wells may schedule a public hearing to consider the need or advisability of permitting the drilling or operation of a storage or waste disposal well, or converting a well to these uses, if the public safety or other interests are involved." This provision allows the Geological Survey Division to consider need in their review of permit applications. There is no such provision in Part 55 of Act 451 or the associated administrative rules.

✓ Environmental Justice

Comments:

Many individuals questioned whether environmental justice was considered in the review of this permit application. Comments included the statements that demographics of the area should be evaluated and Title VI of the Civil Rights Act is applicable and should be considered.

Applicant's Response:

In their August 12, 1997, response to comments, the applicant responded to this issue. In particular, CWERLP submitted a demographic analysis based on Census Bureau information regarding the communities surrounding the proposed project.

Air Quality Division Response:

The Air Quality Division endeavors to protect the health and welfare of all citizens of the State of Michigan equally. In addition, the state and federal air quality standards that have been established are designed to be protective for all segments of society, including the most sensitive. Therefore, the Air Quality Division has not attempted to determine the racial demographics of the area, but has determined that the permit, as approved, will meet all applicable air quality standards.

National Ambient Air Quality Standards

Comments:

Commenters stated that the emissions of nitrogen oxides and volatile organic compounds, which cause ozone formation, along with the emissions of PM-2.5 have not been addressed with regards to the recently announced United States Environmental Protection Agency more stringent rules for ozone and particulate.

Air Quality Division Response:

There is no direct effect of the new standards on this permit or the facility at this time.

Permit Action

Comment:

A commenter expressed concern that the Department of Environmental Quality is limited to just two choices of either approving or disapproving the permit application, rather than working with Michigan citizens, businesses, and workers to find a better way to cut down on the emissions being deposited in the Great Lakes. The commenter also indicated that a permit may be denied even though all technical requirements are met.

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48903-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

AIR QUALITY DIVISION
PO BOX 30250
LANSING MI 48903-7750

November 24, 1997

Dear Interested Party:

Recently you were sent a copy of a permit to install granted to the Central Wayne Energy Recovery Limited Partnership, along with a letter and a copy of the response to public comment document.

Since that time, revisions have been made to that permit to strengthen and clarify the fuel cleaning plans required in condition numbers 55 and 57 and to correct mathematical errors in the emission limitations specified in condition number 13. The correction of the calculation in condition number 13 does not compromise the stringent emission limitations contained in the condition.

Attached is a copy of the revision document along with instructions on how to replace pages in the information previously sent to you.

Because these revisions have been made, the effective date of the final permit has been delayed until December 29, 1997. Anyone who submitted a comment during the comment period may appeal this decision according to the procedures contained in 40 CFR 124.19-Appeal of the Resource Conservation and Recovery Act (RCRA), Underground Injection Control (UIC), and Prevention of Significant Deterioration (PSD) permits.

Again, thank you for your interest in this project. If you have any questions please contact either Ms. Lynn Fiedler at 517-373-7087 or Mr. Randal S. Telesz at 517-373-7089.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis M. Drake".

Dennis M. Drake, Chief
Air Quality Division
517 373-7023

DMD:SSR:RST:BCW
Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

MEMORANDUM

DATE: October 30, 1997

SUBJECT: *Draft "Region 5 Interim Guidelines for Identifying and Addressing a Potential Environmental Justice Case" (Interim EJ Guidelines)*

FROM: Environmental Justice Regional Team

TO: Region 5 Management and Staff

The purpose of the attached Draft "*Region 5 Interim Guidelines for Identifying and Addressing a Potential Environmental Justice Case*" (*Draft Interim EJ Guidelines*) " is to outline a process for EPA Region 5 management and staff to use when determining whether a case² should be considered a potential environmental justice case and, if so, what course of action should be take for EPA-lead activities.

The Draft Interim EJ Guidelines were created to fill an immediate need to provide Region 5 staff with a methodology for identifying and addressing potential EJ cases. They direct the user to consider the low-income population and minority population of the area in which their case is located and make decisions according to specific criteria. In addition, the guidelines include a number of protocols that provide recommendations to the user on how to address enforcement, permitting, and community involvement when potential environmental justice concerns exist.

There are inherent limitations in these guidelines in that they are based primarily on an assessment of demographics and do not involve a complex analysis of risk or "disproportionate impacts" (a key factor in environmental justice assessment). The benefit to this approach is that it allows for expediency in identifying EJ cases. Should a complex analysis of risk or "disproportionate impacts" be necessary, the guidelines contemplate such an action on a case-by-case basis.

Ultimately, identification of EJ cases within Region 5 will help the Region understand the universe of EJ cases within its boundaries and afford the Agency the ability to target efforts toward these

1 "Environmental Justice" is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

2 "Case" means any site, project, community, area, administrative case, or judicial case.

ENVIRONMENTAL JUSTICE AND PERMITTING PROTOCOL

The purpose of this protocol is to provide permitting staff with practical information on taking Environmental Justice into account in the handling permitting matters. This guideline addresses what steps can be taken in the context of EPA-lead permitting matters. For State-lead permitting matters, it is recommended that you encourage the State to consider environmental justice in their permitting activities.

I. EPA Identification of Potential Environmental Justice Permitting Cases.

- A. Screening and analysis: Use the Interim guidelines to determine if the permitting decision presents potential EJ concerns. For some cases (e.g. cases involving air facilities) the impacted community may be different from or extend beyond the community where the facility is located. In these cases it may be necessary to consider demographic information for all communities potentially impacted.
1. The results of this demographic analysis should be included in the Administrative Record and made publicly available during the public comment period.
 2. If the facility/source is on or near a Tribe or Reservation, notify your Division Tribal Coordinator and the ORC Tribal Coordinator.
- B. Public Involvement: If you determine that the permit decision is in a potential EJ area, you should refer to the EJ and Community Involvement Protocol (Attachment E).

II. Consideration of Surrounding Facilities With Respect To Permit Decision-Making

- A. Evaluate if there are any other similar media-specific permits in this area (e.g. if your decision is a RCRA permit issuance, are there any other RCRA permits in the area). This may involve the following tasks:
1. List name, ID number of any other permits.
 2. Determine who is the permit writer/staff assigned to these additional facilities/sources.
 3. Determine if a permit decision is pending or upcoming.
 4. Determine when these permits will be up for renewal.
 5. Provide this information (#1-4 above) to your management, all other affected permit staff, and coordinate your efforts with your Division/Office EJ Team Window. Meet as a team and jointly determine if there is an adverse or disproportionate impact on the community.

cases. This baseline information gathering and targeting process will provide an avenue for moving the Region toward its goal of virtual elimination of disproportionate environmental impacts on minority and low-income communities.

The entire Draft Interim EJ Guidelines package is composed of the following:

1. **"Interim Guidelines for Identifying and Addressing an Environmental Justice Case"**
Document: Outlines a multi-step process for determining whether a case should be considered a potential environmental justice case.
2. **Frequently Asked Questions (Attachment A):** Provides answers to questions frequently asked by individuals engaged in identifying environmental justice cases.
3. **GIS Protocol (Attachment B):** Outlines the process for obtaining demographic information using GIS (Geographic Information Systems) for a particular case/site. GIS information must be obtained for every case before an environmental justice determination can be made.
4. **Environmental Justice and Enforcement Protocol (Attachment C):** Provides information to enforcement staff on how environmental justice can be taken into account in enforcement matters.
5. **Environmental Justice and Permitting Protocol (Attachment D):** Provides information to permitting staff on how environmental justice can be taken into account in permitting matters.
6. **Environmental Justice and Community Involvement Protocol (Attachment E):**
Provides information to staff on the Office of Public Affairs' role in ensuring public participation and conducting community outreach in environmental justice communities.

By December 1997, these guidelines will be finalized and thereafter used by Regional staff until such time that national guidelines are developed by U.S. EPA Headquarters. However, these guidelines should also be considered a "living document" which will be subject to modification as new information becomes available and feedback from Region 5 EJ stakeholders is received. The Environmental Justice Regional Team welcomes your comments, suggestions, and questions on these guidelines. Please direct all feedback, in writing, to your respective Division/Office EJ Regional Team window by November 15, 1997.

These Interim Guidelines are for the use of U.S. EPA Region 5 personnel. Region 5 reserves the right to change these guidelines at any time, without prior notice, or to act at variance from these guidelines. These guidelines do not create any rights, duties or obligations with respect to any third parties.



Central Wayne Energy Recovery
Limited Partnership

AIR QUALITY DIVISION

AUG 28 1996

PERMIT SECTION

August 23, 1996

Ms. Rhonda L. Ross
Director, Air Quality Management Division
Wayne County Department of Environment
640 Temple, Suite 700
Detroit, MI 48201

Mr. Dennis Drake
Chief, Air Quality Division
Michigan Department of Environmental Quality
Hollister Building, Fifth Floor
106 West Allegan Street
Lansing, MI 48909-7760

Dear Ms. Ross and Mr. Drake:

The Central Wayne Energy Recovery Limited Partnership is pleased to submit the enclosed "Screening Multi-Pathway Health Risk Assessment (Revised)" (the "revised Study") for the Central Wayne Air Quality and Energy Recovery Project (the "Project"). The revised Study incorporates comments received on the March, 1996 draft report from Bob Sills of the MDEQ-AQD in his June 12 correspondence as well as from the MDEQ during the June 19 meeting in Lansing.

As you will see from reviewing the results of the revised Study, any health risk posed by the Project remains well below the very strict guidelines recommended by EPA and MDEQ. The revised Study should therefore provide further evidence of this Project's environmental acceptability and we hope it will aid the Wayne County AQMD and MDEQ in evaluating the Project's air permit application.

If you have any questions, please contact me. Thank you for your continued interest in the Project.

Sincerely,

Thomas Barnett
Project Manager

Enclosure

cc: J. Erik Schaeffer, P.E. - CWCSA
L. Fiedler - MDEQ (w/o enclosure)
J. Gahris - USEPA Region 5

RECEIVED

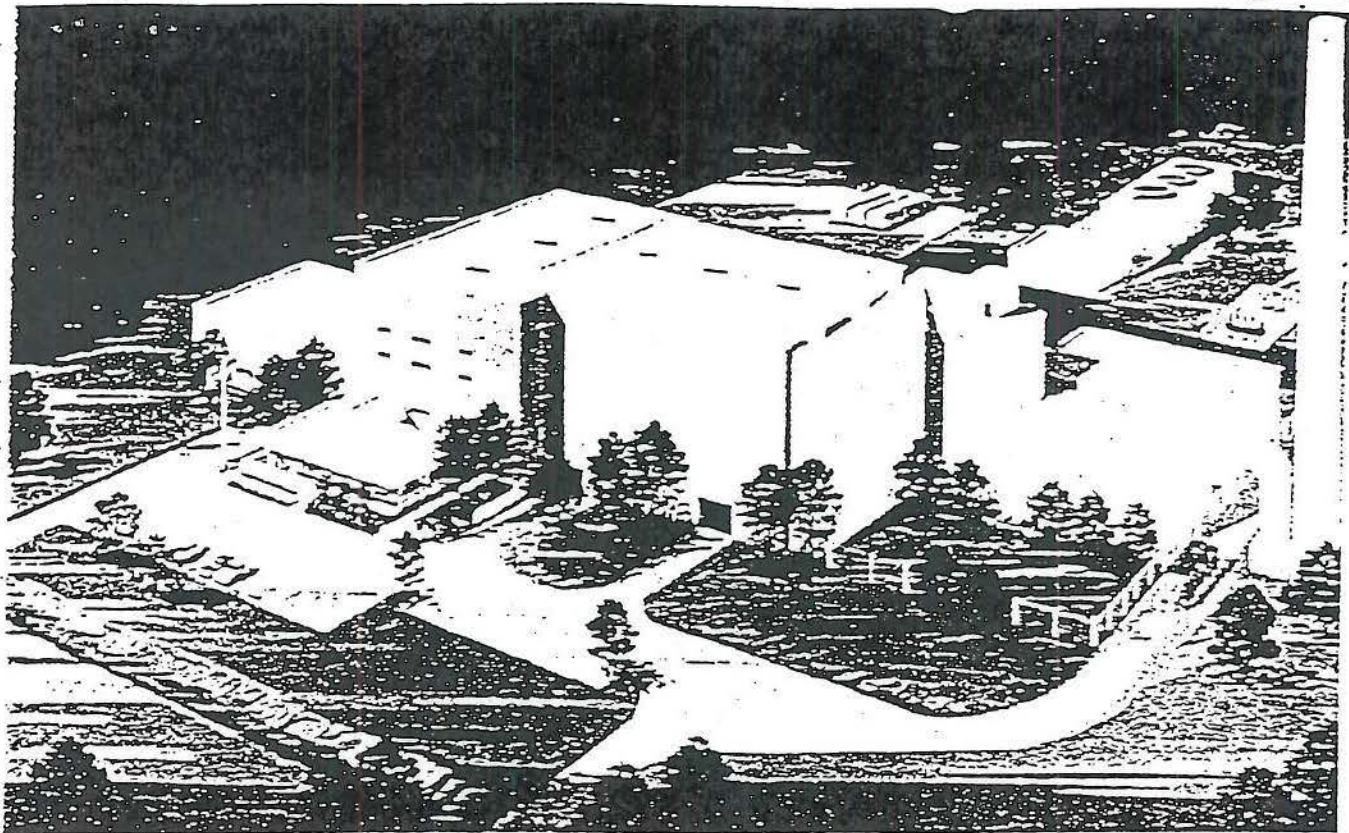
AUG 26 1996

AIR QUALITY DIVISION

Power Plant
4901 South Inkster Rd.
Dearborn Heights, MI 48126
313/277/2332
313/292/7703 FAX

Home Office
250 West Pratt Street
Baltimore, Maryland 21201
410/783/2388
410/783/3510 FAX





Screening Multipathway Risk Assessment for the
Central Wayne Air Quality and Energy Recovery Project



Central Wayne Energy
Recovery, L.P.

Revised
August 1996

ENSR.

Doc. No. 1873-004-460

4.0 EXPOSURE ASSESSMENT

This section identifies the type and magnitude of potential public exposures due to identified CPCs potentially emitted by the CWAQER project. First, representative potential receptors are determined based on the meteorological and climatic conditions present in the Project's impact area and geography of the surrounding area. Next, potential routes of exposure are identified for each receptor, based on information about activities which typically occur in the area. It is important to note that the receptors and exposure pathways evaluated in this risk assessment represent hypothetical people and activities, and are not intended to represent any actual individuals living near the CWCSA facility.

Section 4.1 of the Exposure Assessment describes the study area and the activities that may take place in the vicinity of the CWAQER project. Based on this information, receptors are identified in Section 4.2. The potential exposure pathways by which these receptors may be exposed are described in Section 4.3. Section 4.4 discusses the methodology used to estimate exposure point concentrations, or the magnitude of compounds which a receptor may contact in a given environmental medium. Finally, a description of the methodology used to estimate exposure doses is presented in Section 4.5. This section also includes a discussion of the exposure parameters assumed for each receptor and exposure pathway.

4.1 Description of the Study Area

The existing CWCSA facility is located in an industrially zoned area approximately 14 miles (23 kilometers) west-southwest of downtown Detroit and approximately 4 miles (6 kilometers) northeast of the Detroit Metropolitan Airport. Suburban residential areas are located adjacent to the facility site. Areas outside the immediate vicinity of the CWCSA facility to the south through northwest are primarily rural. The remaining areas are predominantly suburban/urban. A heavy industrial area is located approximately 8 miles (13 kilometers) to the east.

Based upon information from the U.S. Department of Agriculture Soil Conservation Service and the Wayne County Cooperative Extension Service (Fedewa, 1995), several dairy and beef farms are located in the rural areas. The closest moderately-sized commercial farm is located in Cherry Hill, approximately 12 miles (20 kilometers) to the west of the CWCSA facility. However, for the purposes of this screening risk assessment, a theoretical "closest farm" location was substituted. Its location was on potentially farmable land near the Detroit Metropolitan airport and was closer than either the large Cherry Hill farm or the several smaller farms at intermediate distances in Michigan or Ontario. In addition, predicted concentrations and deposition rates at the theoretical

farm in Romulus were considerably higher than at the Cherry Hill farm or any theoretical farm in Ontario. This farm has been assumed to stock both beef and dairy cattle.

It was assumed that residents of this area are likely to fish in the nearby lakes. As discussed below, information was obtained from the MDNR to determine which bodies of water would be frequently fished.

4.2 Identification of Receptors

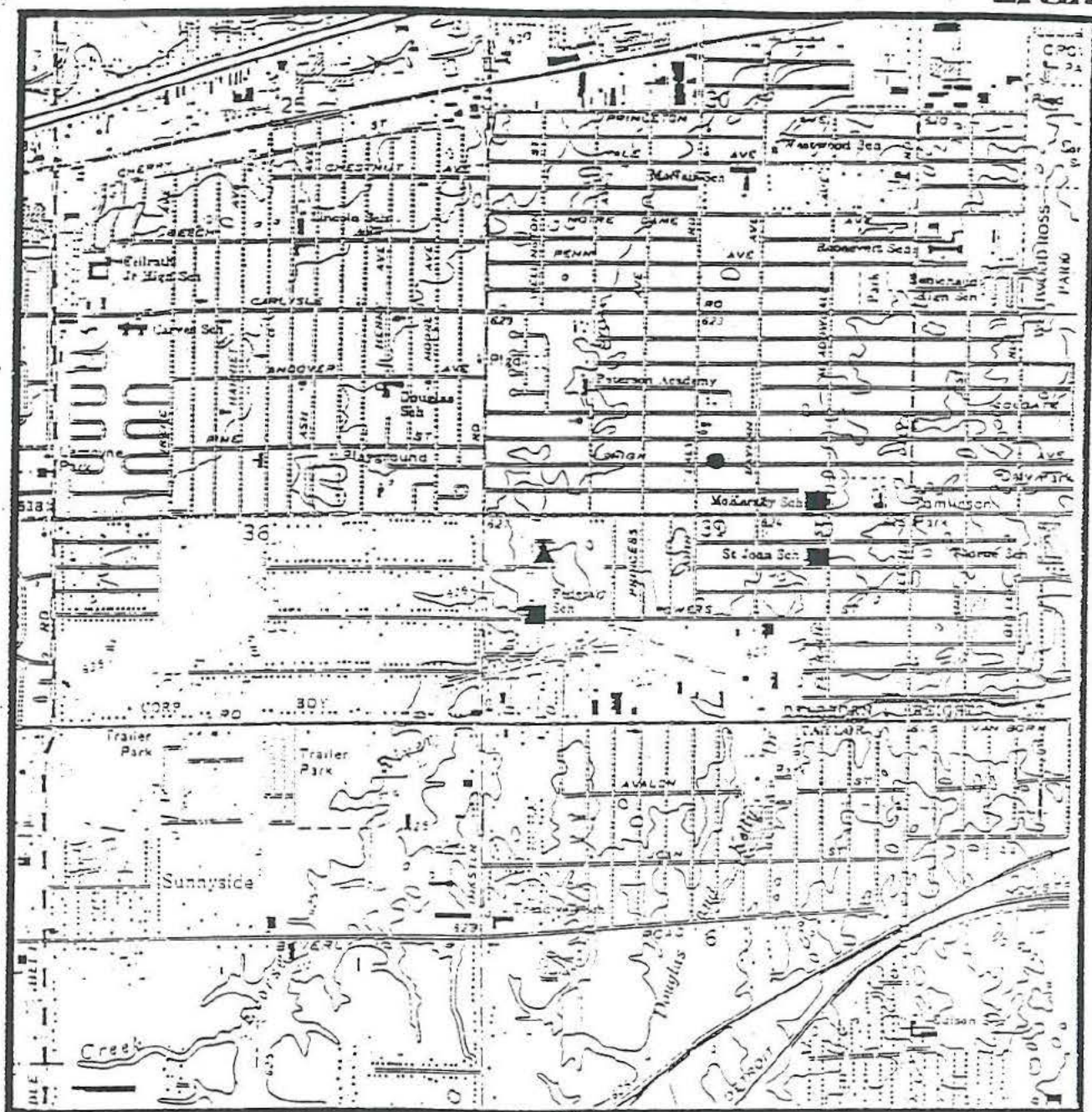
Consistent with the SMRA guidelines developed by the U.S. EPA, five specific receptors (of four types) have been identified as the hypothetical individuals most affected by emissions from the facility. The four types of receptors are evaluated in this risk assessment, and include:

- a Reasonably Maximally Exposed (RME) Adult Resident;
- a Reasonably Maximally Exposed (RME) Child Resident;
- a Subsistence Farmer; and
- a Frequent Fisher.

It was decided to include two alternative fishing locations to gain a sense of how variable the resultant risks would be for fishing in different nearby watersheds. These receptors and the potential exposure pathways by which they may be exposed are shown in Figure 4-1 and are discussed in detail in the following sections.

4.2.1 Reasonably Maximally Exposed (RME) Residents

The RME Resident is a hypothetical individual assumed to live, work, and recreate at a location where the most potential exposures could theoretically occur. At this location, everyday activities may result in the RME Residents coming in contact with compounds emitted from the facility (see Figure 4-1). It is important to note that the RME Resident receptor represents not an actual person, but the sum of all exposures resulting from all activities in which people in the area may engage. The risk estimates for the RME Resident receptor in this assessment conservatively assume a high level of exposure to all possible routes and media to which people in the area may be exposed. It is highly unlikely that any one individual would have the level of exposure assumed here. Therefore, the exposures and subsequent risks, if any, that may be posed to people who actually reside in this area will almost certainly be significantly lower than the estimates provided in this risk assessment.



SOURCE:
U.S.G.S. 7.5 Minute Series Topographic Quadrangle
of Inkster, Michigan

- ▲ CWACER Project
- Reasonably Maximally Exposed (RME) Residents
- School

0 0.5 1
Scale in Miles

0 0.5 1
Scale in Kilometers

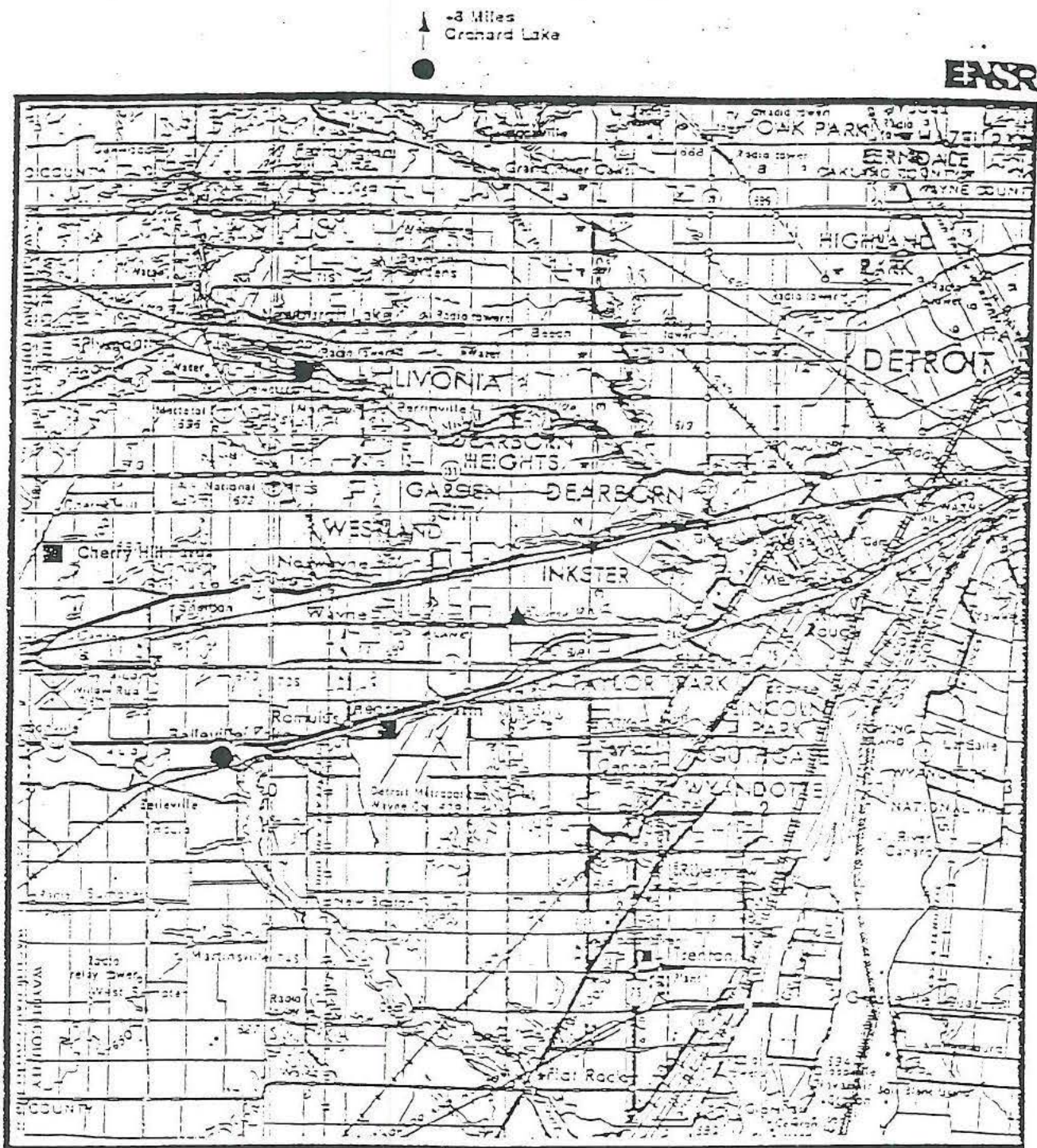
FIGURE 4-1
Near-Field Screening Risk Assessment Key Receptor Locations

As shown in Figure 4-1, the point of maximum CWAQER project impact (considering both concentration and deposition) is located approximately 0.5 miles (700 meters) northeast of the CWAQER project's stack. ^{IN KESTER} Based on standard risk assessment procedures, the RME Adult and Child Resident receptors are assumed to live at this location of maximum CWAQER project impact. Other potential receptors initially considered, and ultimately not selected, were the Federal School (located approximately 1/8 mile [200 meters] to the south), St. John School (located approximately 5/8 mile [1000 meters] to the east), and McKersky School (located approximately 5/8 mile [1000 meters] to the east-northeast). The selection of those receptors would not have been as conservative because ambient air concentrations and deposition rates (i.e., impacts) at those schools are lower than the values predicted for the RME Resident receptor (refer to Table A-7 in Appendix A). Therefore, the potential risks associated with exposure to compounds potentially emitted from the CWAQER project are also lower than those predicted at the RME Resident receptor. For this reason, the school locations were not considered further in the risk assessment.

The RME Resident may theoretically come in contact with compounds emitted from the Project via inhalation while residing at the RME Resident location. While working or playing outdoors, the RME Resident (especially the child) may theoretically ingest soil onto which compounds emitted by the Project may have been deposited. Produce which could be affected by the Project emissions may be grown in backyard gardens at the RME Resident location. It is possible that the RME Residents may also consume some fish caught nearby, and may consume beef and dairy products from local farms, as well. However, the recommendations of the U.S. EPA 1994c screening model guidance are to assume that a frequent fisher (e.g., hypothetical "subsistence" fisher) and "subsistence" farmer represent much larger exposures by these pathways. Only if the latter exposure doses and risks are not acceptable would it be necessary to examine in more detail the comparable exposures to individual residents.

4.2.2 Subsistence Farmer

The Subsistence Farmer is a hypothetical individual assumed to live, work, and play at the commercial beef/dairy farm located closest to the Project (see Figure 4-2). As a result of the Subsistence Farmer's daily activities, this receptor may be exposed to compounds emitted by the Project by way of inhalation, soil ingestion, produce consumption, beef consumption and dairy products consumption. However, consistent with the U.S. EPA SMRA methodology, this receptor is assumed to have insignificant fish consumption compared with that evaluated for the Frequent Fisher.



SOURCE:
U.S.G.S. 1:250,000 Topographic Quadrangle
of Detroit, Michigan



- ▲ CWQER Project
- Frequent Fisher Receptor Location
- Subsistence Farmer Receptor Location

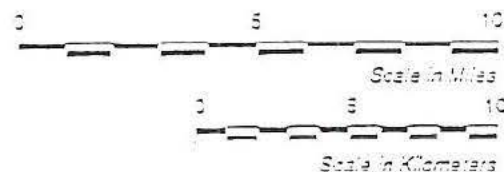


FIGURE 4-2
Far-Field Screening Risk Assessment Key Receptor Locations

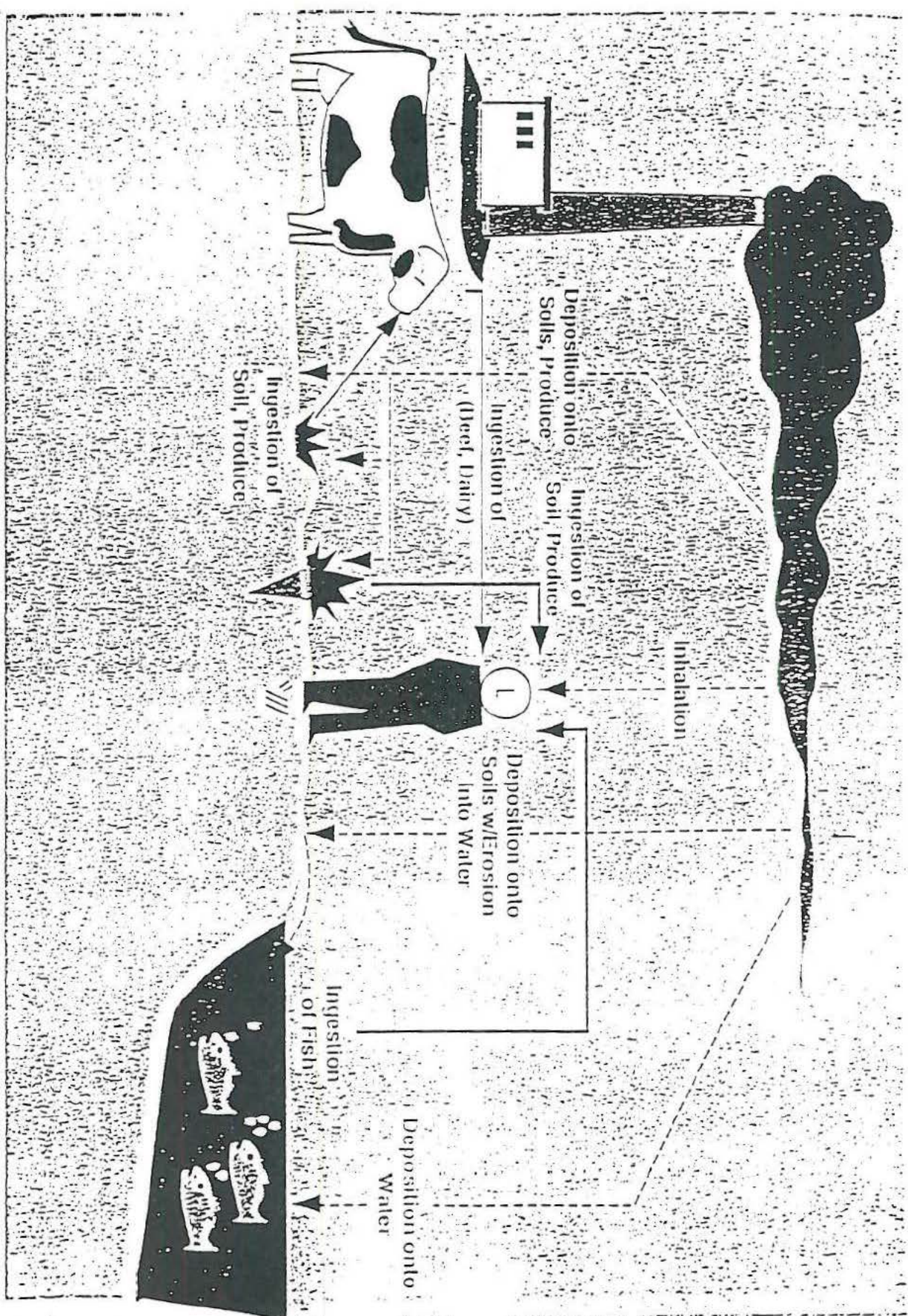


FIGURE 4.3
Potential Exposure Pathways

Exposure via these potential routes of exposure is assumed to occur virtually every day of the residency period of each receptor (30 years). The modeling methods used for each of these exposure pathways is described in detail in Appendix C.

The Subsistence Farmer is assumed to reside at the maximally affected beef/dairy farm. This receptor is assumed to be exposed to maximum predicted concentrations of compounds via the following direct and indirect pathways:

- inhalation of air at the maximally impacted farm;
- incidental ingestion of soil at the maximally impacted farm;
- consumption of produce grown at the maximally impacted farm;
- consumption of dairy products from the maximally impacted farm; and
- consumption of beef from the maximally impacted farm.

Exposure via these potential routes is assumed to occur virtually every day of the entire period of exposure (40 years).

The Frequent Fisher is assumed to reside near the lakes that are fished and has four pathways of potential exposure for which doses are evaluated.

- inhalation of air at the lake area residence;
- ingestion of local soil, at the same rate as a resident gardener;
- ingestion of vegetables at the same rates as adult residents; and
- ingestion of fish caught in either of the identified lakes.

Exposure via these routes is assumed to occur virtually every day for the entire exposure period (30 years).

In accordance with U.S. EPA guidelines (U.S. EPA, 1994c), the screening method does not account for gradual build-up and degradation of concentrations in soil or water over the assumed period of operation. Rather, the method is conservative (i.e., health-protective) in that it calculates

ECOLOGY CENTER



117 N. Division
Ann Arbor, Michigan 48104
313.761.3186
313.563.2414 (fax)

July 29, 1997

Department of Environmental Quality
Air Quality Division
PO Box 30260
Lansing, MI 48909

Comments submitted at the public hearing on July 29, 1997 on permit to install application submitted by Central Wayne Energy Recovery, L.P.

Tracey Easthope, MPH, Director, Environmental Health Project,
Ecology Center of Ann Arbor
117 N. Division
Ann Arbor, MI 48104

These comments are submitted on behalf of the Ecology Center of Ann Arbor, with more than 4,000 members and supporters in southeast Michigan.

We are opposed to the expansion and continued operation of the Central Wayne incinerator because its operation poses unnecessary and therefore unacceptable hazards, particularly given the availability and environmental and safety advantages of the alternatives; and because the facility is not needed, and is uneconomical.

Three presenters from the Ecology Center will cover different aspects of our opposition to this facility.

First, I will discuss limitations of any risk assessment and concerns about the hazards posed by the expansion of this facility. Second, Dr. Hans Posselt of the Ecology Center will discuss some of the hazards associated with the ash monofil and water discharges from the facility. Finally, Mike Garfield, the Director of the Ecology Center, will discuss the clear economic advantages of recycling and landfilling over incineration.

First, I'd like to acknowledge that the controls proposed for this facility are numerous - and a considerable improvement over the existing facility - and the risk characterization performed was certainly more complete than many others that I have reviewed.

However, even extensive and responsible risk characterizations cannot answer the question of whether a facility is safe, because there are so many variables that are not included in the risk characterization. For instance, although we know that this facility will emit a complex mixture of highly toxic chemicals, we only calculate the risk of some of them, and then, for the most part, only one at a time. Even though we know that when some chemicals are combined, they are more toxic than you would expect by just adding together their toxicity. Unfortunately, regulators haven't figured out how to account for this in their models.

The following list is an abbreviated list of concerns related to the risk characterization for this facility.

First, there are numerous persistent, bioaccumulative toxic compounds, and additional carcinogens known to be released during incineration of municipal waste which have not been included in the risk characterization. For instance, the risk assessment didn't take into consideration hexachlorobutadiene, and the numerous chloromethanes, chlorobenzenes, chlorobutanes, chloroethers, and other compounds likely to be emitted.

Particles of incomplete combustion formed during the combustion of municipal waste are poorly characterized. The EPA estimates that thousands of PIC's are formed though only about 100 have been identified. The most comprehensive research done has identified only 60 percent of the mass of the unburned hydrocarbons in the air emissions. This suggests that the characterization of only a handful of compounds does not begin to fully characterize the true risks of the facility.

There is some evidence that the use of brominated compounds is increasing. Brominated compounds, like chlorinated compounds, can combine and form highly toxic, persistent and bioaccumulative compounds. The risk characterization and permit do not consider brominated compounds at all.

As far as I can tell, the risk assessment did not use TEQ values, which is a method for calculating the effects of combinations of chemicals, for all dioxin-like compounds, including PCB's, when calculating risks from the facility.

✓ The risk assessment failed to consider the hormone disrupting potential of PAH's, dioxins, PCB's, mercury and other compounds emitted from the facility. ✓

The risk assessment is not conservative in its use of a frequent fisherperson rather than a subsistence fisherperson. Data from Michigan surveys support the fact that subsistence anglers exist in Wayne County and environs, and their fish consumption is much higher than estimated. Further, as current regulation of the aquatic community is based on protection of the 95th

percentile of tested species in setting water quality criteria, the fish consumption rate used should at least be as protective of the 95th percentile, rather than the 80th percentile used.

The risk assessment also fails to attribute any fish eating to the subsistence farmer. No explanation is given for this omission. A reasonable and conservative approach would be to attribute some fish eating to this population. The risk assessment also does not use conservative assumptions when estimating dairy and beef consumption for the subsistence farmer.

The assessment only characterizes risk for adults for a period of 30 years, even though the contract for this facility lasts 35 years. There are many lifelong residents of this community, and it is certainly reasonable to assume there will continue to be lifelong residents who will reside in the area for the full life of the project.

The risk assessment only characterizes risk for children for six years. The justification for this is not given. Human health data on the effects of chemicals on infants and children suggest that children continue critical development, including brain development, until their late teens. What is the justification for limiting this exposure to 6 years?

The risk assessment fails to consider the unique vulnerability of the developing fetus to the whole range of toxic chemicals released from this facility. Emerging evidence suggests that there may be exquisite moments of sensitivity of the fetus, and that even a tiny exposure, at the right time, can disrupt the function and capacity of that child permanently. Most chemicals, including some of the chemicals which will be emitted from this facility, have not been tested for their capacity to harm the fetus in this way. Of those that have been tested, for the most part, the information has not been included in risk assessment modeling.

A full assessment of the existing lead levels in children must be done. Many children in Wayne County are already lead contaminated or near levels where their cognitive function may be impaired. Any additional exposures will add to the existing risk. The EPA has not established a safe level for lead, because any exposure is thought to pose risks. The community must decide whether they want to add another exposure, which, in combination with the numerous other lead exposures, could threaten the cognitive development of their children.

Is it the position of Wayne County, the DEQ, and the EPA, that the additional lead from this facility will not, in combination with all other sources, result in any cognitive loss in any children?

Given there is no safe level of exposure to lead, how can the facility be characterized as safe?

Given there is no safe level of exposure to lead, the permit fails to encourage the separation of household items to limit the input of lead to the incinerator.

Given there is no known safe level of exposure to dioxins and furans, how can this facility be characterized as safe, particularly given evidence which suggests that minute amounts, and single doses, can disrupt the development of the fetus?

Given there is no known safe level of exposure to dioxins and furans, the permit fails to encourage the separation of materials which are likely to lead to the formation of dioxins and furans, like PVC plastic.

The risk assessment failed to consider that lead accumulates in the placenta during times of fetal stress; that the combination of lead with cadmium increases the toxicity of both compounds; that lead exacerbates the toxic effects of mercury; that lead toxicity is influenced by diet and that low dietary ingestion of calcium or iron increases a predisposition to lead toxicity.

Was an assessment of the nutritional status of children in the surrounding area done. The number of children in poverty in the area is significant, and may indicate poor nutritional status. Particularly in Inkster, where 23% of the entire population is under the poverty level. The number of children below the poverty level is much higher yet.

The risk assessment didn't consider the many additional exposures to lead including dietary lead exposure, lead in cigarettes, and the additional lead from bone demineralization in people with accumulated lead exposure.

The risk assessment fails to factor in the carcinogenic effects of lead and of several other compounds likely to be emitted from this facility.

It is unclear whether the risk assessment factored in the higher dioxin and furan limits allowed in the first three years, or whether the lower limits were used in the calculations.

✓ Until only a year ago, the State used a 1 in 1 million cancer risk standard when permitting facilities. The current administration has changed that risk standard to 1 in 100,000. This facility would not meet the State standard if it had been permitted only a year ago.

The risk assessment fails to consider noncompliance in its risk characterization. This facility has had documented instances of

noncompliance which resulted in increased emissions to the community.
The risk assessment assumes perfect operation of the facility when assessing risks. This is not a realistic nor is it a conservative assumption.

The risk assessment process does not allow a full consideration of the existing exposures in a community. According to data available from the Toxic Release Inventory database, in 1994, 112,488 pounds of toxic chemicals were released in the communities immediately surrounding the facility, and another 30,794,450 pounds were transferred in to those communities for disposal. Although these numbers are high, they greatly underestimate the amount of toxins released and transferred into area communities. These existing exposures, as well as historical contamination, must be considered in any real risk characterization.

The risk assessment fails to prove that this facility will be safe to developing fetuses and children, and seems to contradict the President's Executive Order on Children's Health, which emphasizes the importance of developing standards which protect children.

The failure of the permit to apply carbon monoxide limits during upset conditions is extremely problematic. Because carbon monoxide levels are associated with incomplete combustion and the formation of dioxins and furans, and because there is no continuous monitoring of those contaminants, this amounts to uncontrolled and unregulated emissions of the most toxic compounds during upset conditions.

Finally, the demographics of the area suggest that this facility will differentially impact low income residents and people of color. Two of the five surrounding communities are well above the State average in the number of minority residents, and four of the five surrounding communities have per capita incomes below the state average. Further, according to the Authority's own analysis, the maximum impact point for annual concentration of PM 10, SO2, and NO2 and the maximum 1 hour concentration for CO all fall in Inkster. Inkster is made up of 64% people of color, who have per capita incomes lower than any of the surrounding communities and well below the state average. Taylor and Westland are also mentioned as maximally impacted communities. Taylor residents are also well below the average State per capita income. Only Westland is above the State average.

Whether or not the intent is to differentially impact low income and minority residents, it is clear that a decision to permit this facility will add to a long list of toxic sources differentially impacting low income and minority Michigan residents.

Risk characterization can't answer the critical question 'do we want this facility in our community'. Many of the contaminants that will be discharged from this facility are highly toxic even in minute amounts, and in some cases, we may already have too many of them in our bodies and breast milk. For dioxins, furans, lead and mercury, and possibly for other compounds, there is currently no or very little margin for safety. Some evidence suggests that we are already full up with these poisons and that additional exposure can lead to important and irreversible harm. Given this exposure is avoidable - that is- there are clear, affordable, available alternatives, the risk seems too large. The question the community must ask is NOT How much harm or risk can a person, a child, or a fetus take, but How much harm and risk can be avoided. The alternative in this instance represents a substantially reduced risk and a substantially reduced cost to taxpayers. The choice seems obvious.

We call on the 5 municipalities to do a real cost and risk comparison between incineration and recycling, and make your decision after looking at all the facts



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

As Amended July 26, 1995

PART 9. EMISSION LIMITATIONS AND PROHIBITIONS—MISCELLANEOUS

R 336.1901 Air contaminant or water vapor, when prohibited. (1/18/80)

Rule 901. Notwithstanding the provisions of any other commission rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
- (b) Unreasonable interference with the comfortable enjoyment of life and property.



R 336.1906 Diluting and concealing emissions. (1/18/80)

Rule 906. Unless prior written approval is obtained from the commission, no person shall build, erect, install, or use any article, machine, equipment, or other contrivance if the sole purpose of the article, machine, equipment, or other contrivance is to dilute or conceal an emission without resulting in a reduction in the total release of air contaminants into the atmosphere. This rule does not apply to the control of odors.



R 336.1910 Air-cleaning devices. (1/18/80)

Rule 910. An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.



October 30, 1997

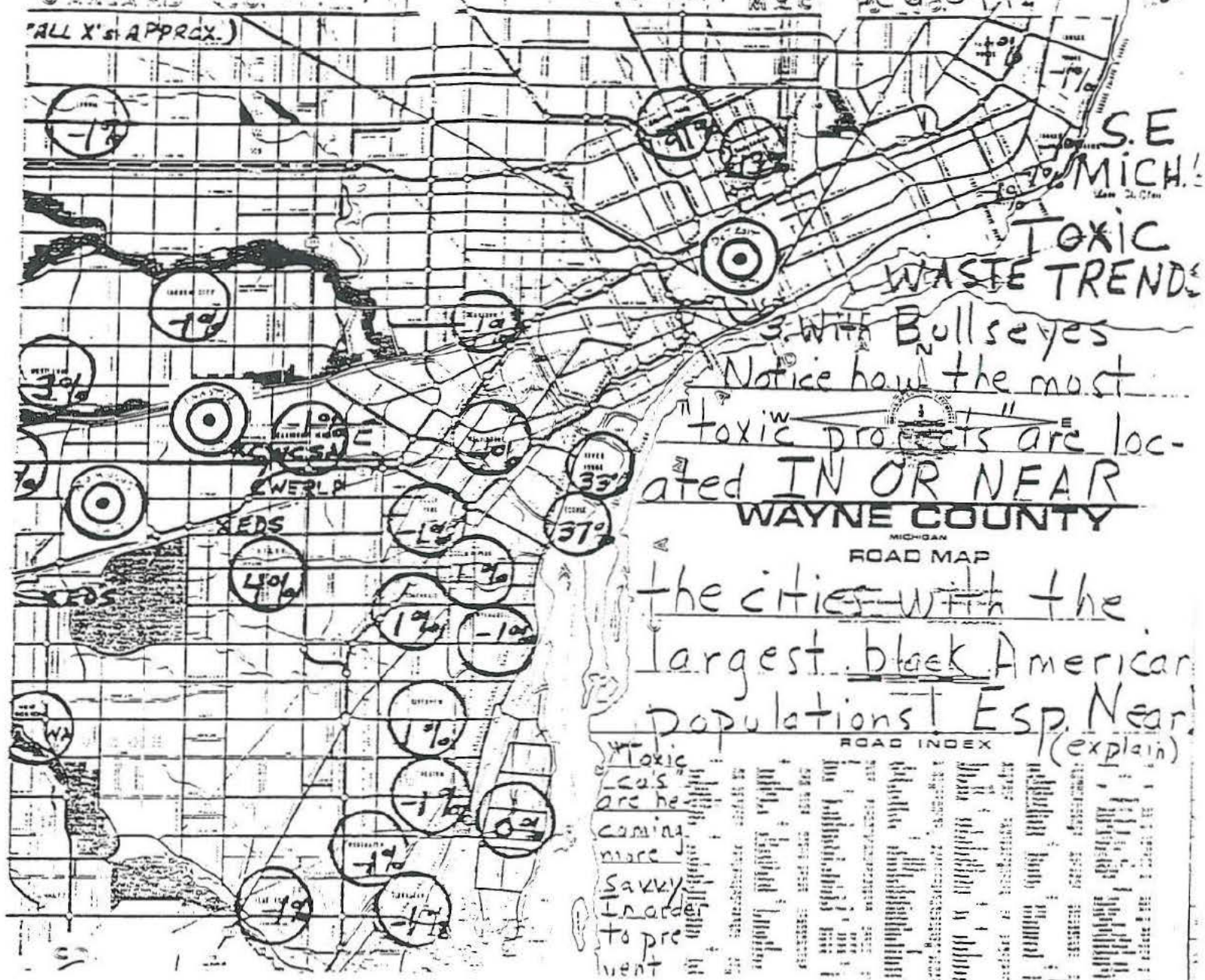
6. Rule 201(3) and Section 5510 of Act 451, P.A. 1994 - The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Departments' rules or the Clean Air Act.
7. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required in Rule 219(1)(a), (b) and (c). The written request shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environmental Quality.
8. Rule 901 - Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.
9. Rule 912 - The owner or operator of a source, process, or process equipment shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant in excess of standards for more than one hour, or of any air contaminant in excess of standards for more than two hours, as required in this rule, to the District Supervisor, Air Quality Division. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the District Supervisor within 10 days, with the information required in this rule.
10. Approval of this permit does not exempt the person to whom this permit was issued from complying with any future regulations which may be promulgated under Part 55 of Act 451, P.A. 1994.
11. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
12. Operation of this equipment may be subject to other requirements of Part 55 of Act 451, P.A. 1994, and the rules promulgated thereunder.

SPECIAL CONDITIONS

13. The pollutant emission rates from the three Municipal Waste Combustors, hereinafter referred to as "MWCs," shall not exceed any of the concentrations or mass emission rates listed below in Table 1:

5.

"ALL X'S APPROX.")



ish in all directions

WHERE THE EXPENSIVE HOMES ARE

As a percentage, Orchard Lake Village at the northern tip of West Bloomfield Township has the highest concentration of new over-\$500,000 houses, according to Housing Consultants of Clarkston. Of 19 new-house permits granted there since the start of 1996, 14 have been for houses over \$500,000.

In numbers, Oakland County has the most over-\$500,000 new houses since the start of 1996 — 300. But Washtenaw is the county with the highest percentage, about 4 percent of new houses.

Here are the number of new-house permits at \$500,000 and up since the start of 1996:

Livingston County	23
Macomb County	90
Oakland County	300
Washtenaw County	128
Wayne County	45

By Judy Rose

available. Each house is individually designed, from 3,000 to 10,000 square feet. Call 1-248-474-0499, 9-5 weekdays.
14. **PINE CREEK RIDGE**, Brighton
By Abbey Homes and others
\$500,000 to \$1.3 million

Formerly a Boy Scout camp, 300 home sites on 700 wooded acres, with 105 houses built so far. The property has two lakes, a beach, thousands of mature pine trees, hiking trails and a log lodge. Small sailboats, paddleboats and rowboats are available. Call 1-313-227-9610, 12-5 Tue.-Sun.

15. **RAVINES OF NORTHVILLE**, Northville
By Robert R. Jones & Associates
Beginning just under \$500,000.

Community will have 38 houses between 3,500 and 4,000 square feet, with much opportunity for customizing. Perimeter, Erward interior designers work with architects from the beginning. Call 1-313-454-9484, 12-5 daily except Thu.

16. **SOUTH SHORES ESTATES ON PINE LAKE**, West Bloomfield

By John Richards Homes
\$850,000 to \$2.3 million

Gated community has private docks and swim club on Pine Lake. Highly custom houses. Call 1-248-348-1600, 9-5 weekdays.

17. **SPRINGS HILL**, Bloomfield Township
By Uziris/Deneweth Co.
\$750,000 to \$1.1 million

Hard-to-get Bloomfield Township land will hold 19 finely finished houses. Spacious rooms, lavish moldings, cherry-trimmed library, curved staircase, lavish master bedroom with his-and-her vanities and walk-in closets, good insulation. Call 1-248-547-0000, 7:30-5 weekdays.

18. **STONEBRIDGE**, Ann Arbor

Many builders
\$400,000 to \$1.2 million

Lakes, streams, stone bridges and a public golf course wander through this 555-acre subdivision, slated for about 300 condos below \$250,000 and about 400 houses, so far running to \$1.2 million. Only natural exterior materials, no vinyl or aluminum. Home owners bring their own builder or choose from a list of many working here. Call 1-313-747-1555, 9-5 weekdays except Thurs. 12-5 weekends.

19. **STONEGATE OF FRANKLIN**, Franklin

By Brody Homes
\$600,000 to \$1.2 million

About 20 acres of scarce land in Franklin with 18 home sites. Every home is truly custom, with no repeats. Private, wooded lots. Call 1-248-335-8900, 9-5 weekdays.

20. **TOWNSLEY FARMS**, Ann Arbor

By H.S. Lauder Inc.
\$750,000 to \$1.4 million

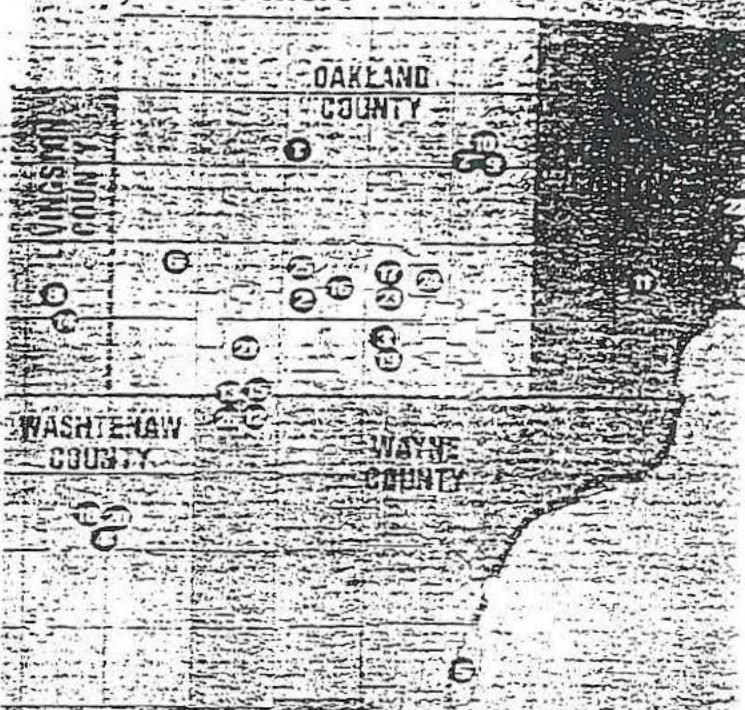
About 1- to 2-acre heavily treed lots near the Huron River, sharing a common area on the river. All completely custom premium houses. Call 1-313-747-6100, 9-5 weekdays.

21. **TURBERRY ESTATES**, Novi

By John Richards Homes
\$700,000 to \$2 million

Gated community, across 3 Mile Road

Subdivisions with homes costing \$500,000 or more



1. **Bridge Valley**, Canton

2. **Chelsea Park**, W. Bloomfield

3. **Franklin Forest**, Franklin

4. **Geddes Glen**, Ann Arbor

5. **Golf View Shores**, Grosse Ile

6. **Hickory Valley Estates**, Milford

7. **Hills of Oakland**, Oakland Twp.

8. **Honors of Oak Pointe**, Brighton

9. **Kingspointe**, Oakland Twp.

10. **Knottwood Pines West**, Oakland Twp.

11. **Manchester Estates**, Clinton Twp.

12. **Oaks of Northville**, Northville

13. **Pheasant Hill**, Northville

14. **Pine Creek Ridge**, Brighton

15. **Ravines of Northville**, Northville

16. **South Shores Estates**, W. Bloomfield

17. **Spruce Hill**, Bloomfield Twp.

18. **Stonebridge**, Ann Arbor

19. **Stonegate of Franklin**, Franklin

20. **Townley Farms**, Ann Arbor

21. **Turberry Estates**, Novi

22. **Weatherhead Estates**, Chesterfield

23. **West Bay on Pine Lake**, W. Bloomfield

24. **Whispering Pines**, Bloomfield Hills

25. **Woodcliff on the Lake**, W. Bloomfield

26. **Woods of Edenberry**, Northville

Call 1-248-348-1600, 9-5 weekdays.

22. **WEATHERHEAD ESTATES**, Chesterfield

Township

By several builders

\$200,000 to \$600,000

The Salt River runs through this property, where 37 building sites are on 36 acres, with 7 acres set aside as a park. Residents buy a lot, then build in a balloon. Call 1-313-735-1111, 9-5 weekdays.

23. **WEST BAY ON PINE LAKE**, West Bloomfield

By John Richards Homes

\$600,000 to \$700,000

Ten elegant condos face Pine Lake across Orchard Lake Road, with wide glass windows, balconies, decks. Master bedrooms, kitchens are especially well

\$750,000 to \$1.3 million

Gated community in the heart of Bloomfield Hills will hold 12 luxury country French-style homes. Call 1-248-4000, 9-5 weekdays.

25. **WOODCLIFF ON THE LAKE**, West Bloomfield

By Herman Frankel Organization

\$600,000 to \$1.3 million

Free-standing houses and attached townhomes next to West Bloomfield nature preserve and Morris Lake beach and look on the lake. Call 1-248-3501, 12-5 closed Thursdays.

26. **WOODS OF EDENBERRY**, Northville

By Cambridge Homes

\$600,000 to \$1.2 million

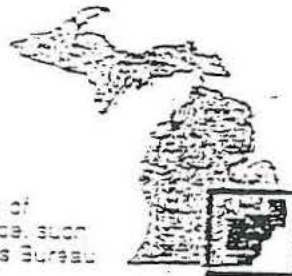
A 14-acre park between 100 and 150

UPDATE
Real Lenders
DATE DTG LOCK REFR 1/90
INTERNATIONAL MORTGAGE CORP.

Southeast Michigan's ethnic and racial trends

Racial movement in seven Michigan counties from 1980 to 1994.

Note: Percentages will not add up to 100 because respondents of Latino heritage may also indicate they represent a particular race, such as black or white. Also, the "other" category used by the Census Bureau has been excluded.

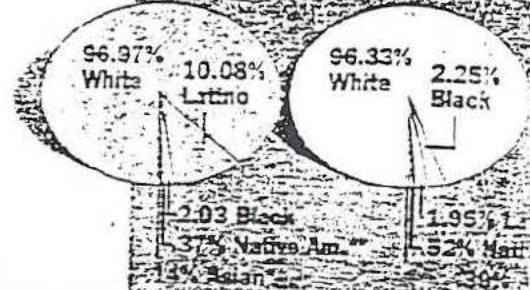


DETAIL

St. Clair County	Population change in percentage points
Total population	+9.81%
White	+12
Black	+22
Asian	+26
Native Am.	+16
Latino	-8.13

ST. CLAIR COUNTY

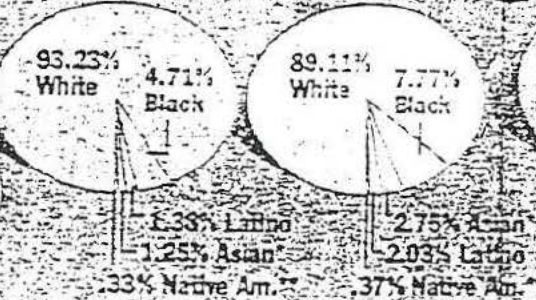
1980 1994



Oakland County	Population change in percentage points
Total population	+2.37%
White	-1.13
Black	-3.36
Asian	-1.51
Native Am.	-0.4
Latino	+8.4

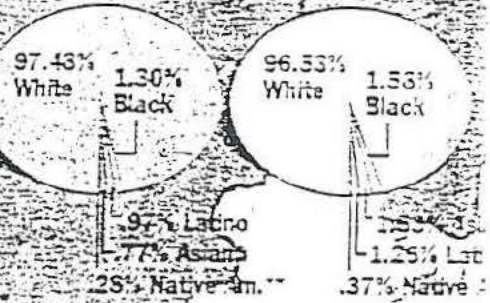
OAKLAND COUNTY

1980 1994



MACOMB COUNTY

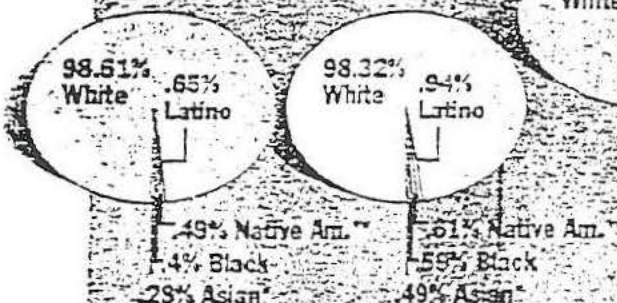
1980 1994



Macomb County	Population change in percentage points
Total population	-4
White	-1
Black	-1
Asian	-1
Native Am.	-1
Latino	-1

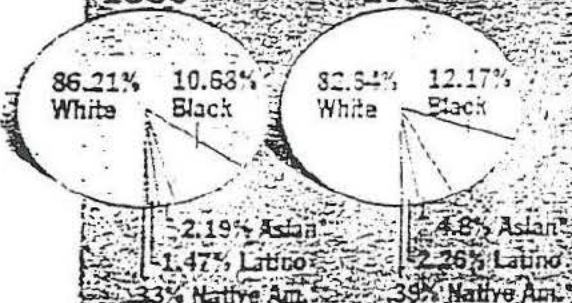
LIVINGSTON COUNTY

1980 1994



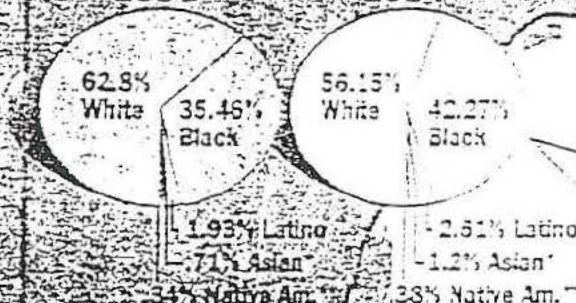
WASHTENAW COUNTY

1980 1994



WAYNE COUNTY

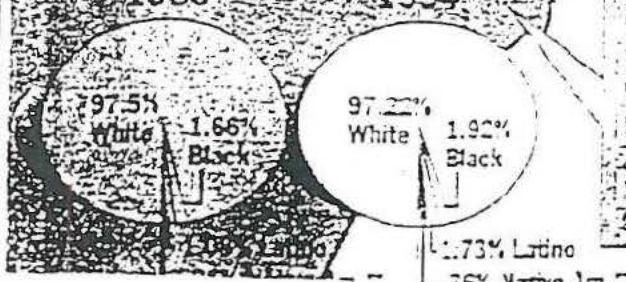
1980 1994



Wayne County	Population change in percentage points
Total population	+1.68%
White	-6.35
Black	+6.81
Asian	+49
Native Am.	+0.1
Latino	+63

MONROE COUNTY

1980 1994



Monroe County	Population change in percentage points
Total population	+0.27%
White	-0.26
Black	-0.25
Asian	-0.25
Native Am.	-0.11
Latino	+0.66

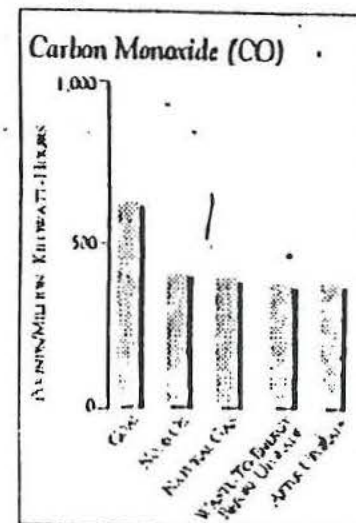
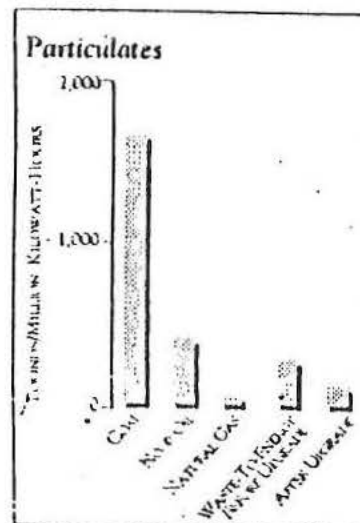
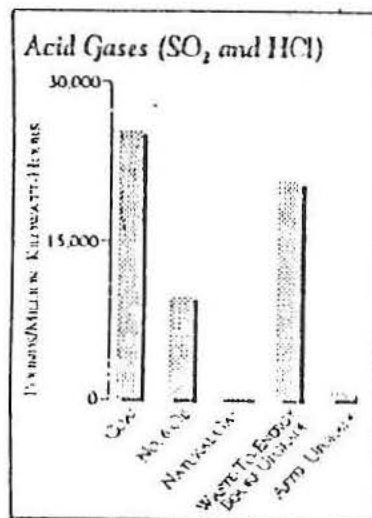
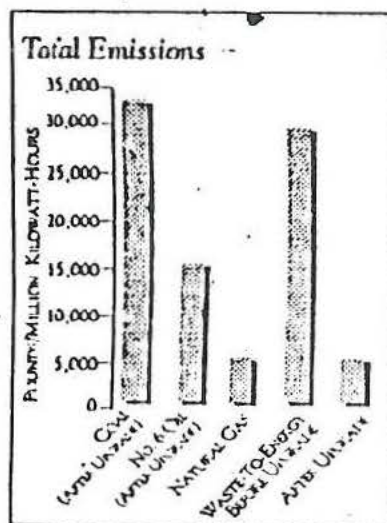
Washtenaw County	Population change in percentage points
Total population	+3.74%
White	+3.58
Black	-1.49
Asian	+2.51
Native Am.	+0.6
Latino	+0.58

3

Waste-to-Energy

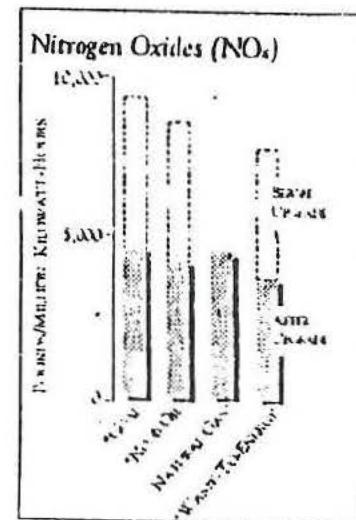
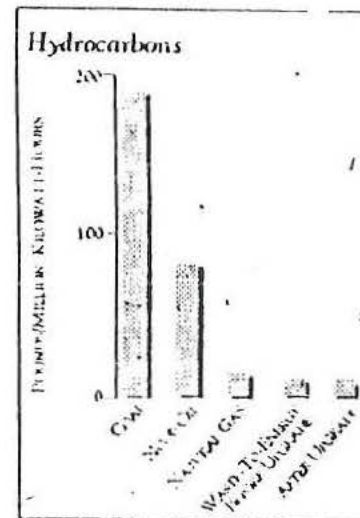
MAKING
A CLEAN
ENERGY
SOURCE
CLEANER

Air Emissions: Waste-to-Energy Compared to Fossil Fuels for Equal Amounts of Energy¹⁰



TRACE METAL EMISSIONS

All fuel sources listed here release trace amounts of metals. Good data are available on waste-to-energy emissions, because they are regulated under the 1990 Clean Air Act and various state environmental laws. Reliable data are not available in some cases for other fuels, because metal emissions from utility power plants are not currently regulated. It is therefore not possible to make an "equal energy comparison" like the other graphs on this page. What is known is this: each fuel shown here may emit at least one metal at higher levels than the other fuels. For waste-to-energy, it may be mercury. Coal emissions contain higher amounts of arsenic, chromium, selenium and zinc. No. 6 oil emissions contain higher levels of cadmium and nickel. Reliable natural gas emissions data are not currently available.



¹⁰Some facilities will be required to upgrade.

8-11-97 DFP
(4)

OTHER VOICES

FISHY QUESTIONS

With confusing advisories, fish eaters need help to avoid toxic

BY MICHAEL R. HARBUT

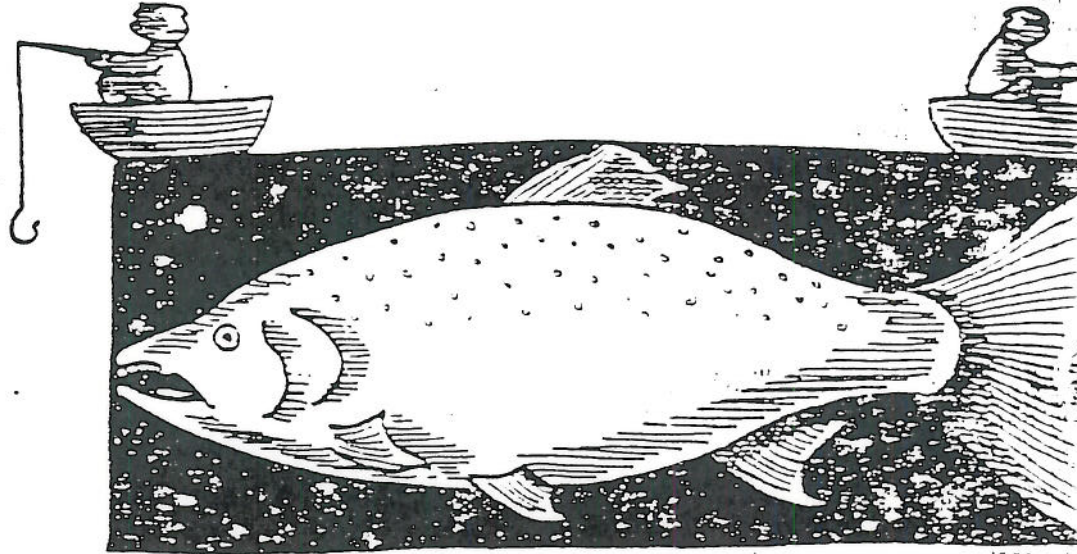
The Great Lakes and Michigan's inland waters are a resource that we properly treasure, but they are also a reservoir of numerous chemicals discharged into the environment, and that is a source of concern.

Some chemicals can be very harmful to animals without actually poisoning them or causing cancer. Certain of these substances, often known as "endocrine disruptors," have been associated with immune-system failures, neurological problems and reproductive disorders. It appears that even tiny amounts may cause long-term health problems, making infants and small children especially vulnerable.

A new analysis of data for hundreds of chemicals released into the water and air shows that the Great Lakes region receives more endocrine-disrupting chemicals than any other region in the country. Because so little is known about their long-term health effects, Michigan, among other Great Lakes states, may be a test tube — and our citizens unwilling subjects — for a large-scale and unpredictable experiment.

The Toxics Release Inventory of the U.S. Environmental Protection Agency collects information on more than 600 harmful chemicals discharged into the environment. A recent analysis of the latest data by the non-profit environmental information center showed discharges of 17 million pounds of endocrine-disrupting chemicals in the Great Lakes Basin for 1995. This was 24 percent more than the next-most polluted region. Because companies are only required to report discharges of 18 specific compounds, the Great Lakes states probably have a much higher contamination level than the these numbers indicate.

Polychlorinated biphenyls (PCBs), among the best known endocrine-disrupting substances, abound in the coastal waters of Michigan and in the wildlife popu-



health effects, researchers have found that PCB lowers the IQs of children born to women who ate contaminated fish during pregnancy. Unfortunately, before this problem was clearly understood, local fish were a dietary staple for thousands of Michigan residents.

Eventually, Great Lakes states began issuing "fish advisories," warning consumers to stop eating certain types of fish and to reduce consumption drastically of others. But when advisories are confusing, they do little to protect public health.

Advisories often recommend different consumption levels for women of childbearing age, as well as children, than for the rest of the population. Residents must consider the type of fish, size and body of water. The Michigan Department of Community Health issues an advisory different than the one put out by the U.S. Environmental Protection Agency. Finally, fish advisories require people to remember when they last ate fish and what kind it was.

Realizing that this approach may pose a barrier to consumers, the Michigan State Medical Society is

initiating a panel to develop guidelines for patients on precautions for fish and water consumption. While no scientific consensus has emerged over the health risks posed by endocrine-disrupting chemicals, the available evidence demands a more thorough analysis for the problem.

In the meantime, experience teaches us to limit exposure to suspected toxic chemicals wherever possible. Toxicologists and biologists have shown a clear connection between the compounds and damage to the endocrine and reproductive systems of animals. Because there isn't a shred of scientific evidence suggesting that humans are immune, we must heed nature's warning.

Clearly we need a better picture of these chemicals and the problems they may cause. We must have more accurate accounting of chemical discharges. This will require companies to report lower emission levels, and it will mean adding utilities and incinerators to the list of industries already included. Incinerators, for example, emit dioxin, an endocrine disrupter and carcinogen, which enters our food chain through

MARGARET SCOTT, SOCIALIST TO THE BONE

how much dioxin is released in smelting each year.

So far, the problems of endocrine-disrupting chemicals have been conspicuous to most people, researchers and physicians. On the other hand, they are becoming increasingly aware of reproductive problems in both animals and humans, as well as the failure of child immune systems to fight off illnesses, and some learning disorders that may be due to endocrine disruptors.

Although the Great Lakes may have more than five times these chemicals, they are not in communities across America. Fish advisories have been issued by virtually every state in Michigan's experience. Any indication, the sooner we stand the nature of this law, the better off we will be.

Michael R. Harbut, M.D., is Chairman of the Michigan State Medical Society's Toxics Committee.

For consumption advice, available literature, or contact information, call 1-800-456-7890.

Trash plan update could cost Romulus, Belleville

By IVAN HILFMAN
MCN Staff Writer

What you don't know can't hurt you. That seems to be western Wayne communities' attitudes toward the Wayne County solid waste plan update. Though Wayne County Director of Environment Jim Murray's proposed update threatens to impose a hefty financial burden on Belleville and Romulus, community leaders remain in the dark about the plan. The penalty will be imposed on communities that don't host a landfill or don't recycle and/or compost 40 percent of their waste stream. These communities will be forced to incinerate a large portion of their waste instead of

landfilling it. Incineration tends to cost double or triple landfilling. At the high end, Detroiters pay over \$90 per ton for incineration. At the low end, many communities pay about \$20 per ton for landfilling. (The Detroit incinerator is only running at half of its capacity, creating financial strains on the city. Forcing communities to incinerate could enable the Detroit incinerator to pay off its large debts.)

Both Belleville Department of Public Services Director Keith Boc and David Paul, his counterpart in Romulus, said they were in the process of providing waste stream data to the county.

Neither was aware of their waste stream volume, make up, nor the po-

tential financial burden. However, figures obtained from environmentalist Harold Stokes indicate that both communities will pay dearly if the update is adopted.

In 1995, Belleville landfilled 7,104 tons, recycled 7422 tons, and composted 1,176 tons. Romulus landfilled 5,465.46 tons, recycled 190.45 tons, and composted 209.

Unless both communities can increase composting and recycling, they will be forced to pay hundreds of thousands of dollars extra to incinerate.

"We do have curbside recycling and a leaf program," said Boc. "The city picks up all leaves, yard waste, and garden waste. We also have a recycling program with RFI ... I think we're do-

ing well."

"We're not involved with the update at this point," said Paul.

Most of the *EyeWitness* circulation area will be unaffected by the update. Canton, Sumpter, and Van Buren at landfill hosts.

"It doesn't affect us at all because we host community Carleton Farms," said Glenn Bowles, Sumpter's administrator. "It will only affect Sumpter in one way. Under the plan, Carleton Farms can't accept waste from communities that don't recycle."

Bowles said that Sumpter is not opposed to the plan.

The city of Wayne is not affected.

See TRASH, page A

y Newspapers

Page A-5

Trash

Continued from page A-1

the plan because it already incinerates all its trash, said City Manager John Zech.

He favors the update and hopes that the Central Wayne County Sanitation Authority Incinerator is able to upgrade and begin operating soon.

Like Wayne, Inkster and Westland incinerate their trash and won't be affected by the update.

"I've not seen draft copies of the update yet," set Canton Supervisor Tom Yack, who as former chairman of the Conference of Western Wayne had asked his

staff to stay abreast of the proposal.

As a host community, exempt Canton deserves to be paid handsomely for landfilling waste from communities unwilling to accept their own trash, he said.

Under Canton's host agreement, the township is allowed free disposal of 70,000 cubic yards. Last year, all Canton's non-toxic residential disposal was free.

Harold said. "We already have truck after truck coming over the Ambassador Bridge ... In 1995, Wayne County Type II landfills (residential landfills) accepted 39 percent more waste from outside of Wayne County than

what County municipalities and commercial businesses sent to those facilities."

One situation the update doesn't address is the acceptance of Canadian waste in western Wayne's landfill. None of the local leaders favored limiting it nor altering the plan to enable Belleville or Romulus to have access to the cheap landfill space over the Canadians.

With the last week's loss of the \$1 billion Toronto garbage contract to Arbor Hills, more capacity should be available in Sumpter and Van Buren's landfills for local trash.

July 29, 1997.

TO THE PERMIT SECTION SUPERVISOR, DENNIS DRAKE, MDEQ:

PLEASE DENY CENTRAL WAYNE ENERGY RECOVERY, LIMITED PARTNERSHIP,
(CWERLP), THEIR PERMIT(S) FOR THE FOLLOWING REASONS:

1. THIS INCINERATOR PUBLIC HEARING, under a portion of Section 5510, of Part 55, of Act 451 of the Public Acts of 1994, VIOLATES THE CONSTITUTION'S GUARANTEE OF "EQUAL PROTECTION OF THE LAWS" TO CITIZENS, RESIDENTS, AND INTERESTED PARTIES WHO WERE/ARE PRESENT AT BOTH THE EDS (Environmental Disposal Systems, Inc.) PUBLIC HEARING OF MAY 1, 1997, pursuant to Part 625, Mineral Wells, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, MCL 324.62501 et seq., and the administrative rules 1979 AC R299.2201 et. seq., AND THE CWERLP INCINERATOR PUBLIC HEARING OF JULY 29, 1997; BECAUSE SAID CITIZENS, RESIDENTS, AND INTERESTED PARTIES, WHO HAVE OBJECTIONS TO BOTH FACILITIES BASED ON "NEED AND ADVISABILITY," HAVE REMEDY, (i.e. DENIAL OF PERMIT BASED ON "NEED"), EXISTING ONLY FOR THE EDS PUBLIC HEARING/FACILITY! THE VIOLATION OF "EQUAL PROTECTION" EXISTS BECAUSE, EVEN THOUGH BOTH PUBLIC HEARINGS COME UNDER ACT 451, AS AMENDED, CITIZENS, RESIDENTS, AND INTERESTED PARTIES WHO OBJECT TO BOTH FACILITIES, CANNOT GET RELIEF, i.e. DENIAL OF PERMIT(S) BASED ON "NEED," FROM THE CWERLP INCINERATOR PUBLIC HEARING; AND, SIMULTANEOUSLY, THERE IS NO "NEED" FOR THE CWERLP INCINERATOR BECAUSE OF THE PROLIFERATION OF LANDFILLS IN WAYNE COUNTY, AND BECAUSE THE WAYNE COUNTY DEPARTMENT OF ENVIRONMENT'S (WCDOE) SOLID WASTE MANAGEMENT PLAN, AS REVISED, HAS A PENCHANT FOR, AND SPECIFIES THE PROLIFERATION OF, AND CONSTRUCTION OF, EVEN MORE LANDFILLS, IN WAYNE COUNTY!

2. THE "RISK ASSESSMENT" portion of your (MDEQ) "STAFF ACTIVITY REPORT IS OBSCENE, i.e. "DEEPLY OFFENSIVE TO MORALITY AND DECENCY,"

("The Merriam-Webster dictionary"). FOR YOU, THE MDEQ, "... (TO BE USING RISK ASSESSMENT), ... TO ESTIMATE THE INCREASED RISK OF HEALTH PROBLEMS IN PEOPLE (US) WHO (WILL BE INTENTIONALLY AND PURPOSEFULLY) EXPOSED TO DIFFERENT AMOUNTS OF TOXIC SUBSTANCES," WHEN THERE IS NO NEED FOR THIS FACILITY, AND WHEN THIS FACILITY COULD, AND SHOULD, BE CLOSED DOWN INSTEAD; TREATS US LIKE GUINEA PIGS IN A LABORATORY, AND VIOLATES OUR GUARANTEE, BY THE CONSTITUTION OF THE UNITED STATES, "TO LIFE, LIBERTY, AND THE PURSUIT OF HAPPINESS!" MDEQ, HOW DARE YOU! Predictably, in "the first scenario," "...the highest impact from the facility's emissions," "...is located $\frac{1}{2}$ mile northeast of the facility..., WHICH IS IN THE CITY OF INKSTER: RAISING THE QUESTION/EXPLANATION OF ENVIRONMENTAL RACISM!

The "second scenario," "...near Metropolitan airport," MY HOMETOWN-ROMULUS, "... (ASSUMES) ... FARMERS THERE (US) (WILL TOLERATE AND ALLOW OURSELVES TO BE) ... EXPOSED TO POLLUTANTS FROM BREATHING THE AIR, INCIDENTALLY INGESTING SOIL, AND EATING VEGETABLES, DAIRY PRODUCTS AND BEEF FROM THEIR (POLLUTED) FARM(S), FOR 40 YEARS..." WITHOUT COMPLAINTS, LAWSUITS, OR BOYCOTTS, ETC. MDEQ, ARE YOU IN FOR A SURPRISE, AND A RUDE AWAKENING!!!!

The "third, fourth, and fifth scenarios," WHICH "... (ACCOUNT) FOR THE POTENTIAL IMPACTS TO THREE AREA LAKES WHICH SUPPORT SUBSTANTIAL FISHERIES..." ARE FAULTY BECAUSE THEY VIOLATE THE "FISH CONSUMPTION ADVISORY" OF 1997, UNDER THE "ADVISORY ON MERCURY IN INLAND LAKES AND RESERVOIRS," for the following reasons:

1. Unlike the "first scenario," the "third, fourth, and fifth scenario" DO NOT TAKE INTO ACCOUNT "... (CHILDREN) FOR SIX YEARS...", EVEN THOUGH THE PROXIMITY OF CHILDREN TO LAKES, (AND EATING THE LAKES' FISH), IS JUST AS IMPORTANT AS THE PROXIMITY OF CHILDREN TO SCHOOLS,

AS THE "FIRST SCENARIO" CITES. Per the 1997 "Advisory on Mercury in Inland Lakes and Reservoirs," "...CHILDREN UNDER AGE 13 SHOULD NOT EAT MORE THAN ONE MEAL PER MONTH OF THE FISH LISTED ABOVE," i.e. "...rock bass, yellow perch, or crappie over 9 inches in length; bass, walleye, northern pike, or muskellunge of any size." IT IS THE RESPONSIBILITY OF THE MDEQ TO IDENTIFY ALL THE SPECIES OF FISH IN THE THREE LAKES LISTED IN THE "RISK ASSESSMENT," i.e. BELLEVILLE LAKE, NEWSBURGH LAKE, AND ORCHARD LAKE. CHILDREN MUST BE INCLUDED IN THE "THIRD, FOURTH, AND FIFTH SCENARIO," AND THE MDEQ CANNOT ADVOCATE THE CONSUMPTION OF FISH MEALS TO CHILDREN IN LARGER AMOUNTS THAN CHILDREN CAN TOLERATE SAFELY AND LEGALLY! See the 1997 "Fish Consumption Advisory/Advisory on Mercury in Inland Lakes and Reservoirs."

B. THE SAME RESTRICTIONS AGAINST EATING INLAND LAKE FISH, ALSO APPLY TO "...MOTHERS WHO ARE BREAST FEEDING, PREGNANT WOMEN, (AND) WOMEN WHO INTEND TO HAVE CHILDREN..." BUT, YOUR (MDEQ) "RISK ASSESSMENT FAILS TO TAKE THEM INTO ACCOUNT EITHER, RECOMMENDING FOR "PEOPLE," WHICH INCLUDES WOMEN OF CHILD-BEARING AGE, FISH MEALS IN LARGER AMOUNTS THAN THEY ARE ALLOWED, BY LAW, TO CONSUME BECAUSE OF MERCURY CONTAMINATION!

C. EVEN THE "GENERAL POPULATION" CANNOT EAT YOUR (MDEQ) "...ASSUMED RATE OF FISH CONSUMPTION (OF) 30 GRAMS PER DAY, WHICH IS ABOUT EQUAL TO ONE $\frac{1}{3}$ POUND FISH MEAL EVERY 5 DAYS. The "Inland Lake Advisory" states, "...No one should eat more than one meal a week..." OF THE ABOVE LISTED FISH!!!!!!

D. INAPPROPRIATELY, LAKE ST. CLAIR WAS LEFT OUT OF YOUR (MDEQ) "RISK ASSESSMENT," YET, MANY FISH IN LAKE ST. CLAIR HAVE MERCURY CONTAMINATION, ESPECIALLY FISH LARGER THAN 12 INCHES IN LENGTH!

IT'S TOO BAD THIS PUBLIC HEARING WAS NOT SCHEDULED FOR AFTER THE MACOMB COUNTY COMMISSION'S REPORT ON LAKE ST. CLAIR WAS DUE TO COME OUT ON AUGUST 14, 1997. ESPECIALLY, IN LIGHT OF THE FACT THAT CWERLP STATES, "...WHAT IS KNOWN IS THIS: EACH FUEL SHOWN HERE (COAL, NO. 6 OIL, NATURAL GAS, AND WASTE-TO-ENERGY) MAY EMIT AT LEAST ONE METAL AT HIGHER LEVELS THAN THE OTHER FUELS. FOR WASTE-TO-ENERGY IT MAY BE MERCURY," ("Making a Clean Energy Source Cleaner"). MDEQ, BECAUSE OF THE PROXIMITY OF LAKE ST. CLAIR, BECAUSE OF LAKE ST. CLAIR'S MERCURY-TAINTED STATE ALREADY, AND BECAUSE CWERLP STATES THAT MERCURY IS A PROBLEM FOR THEM, YOU MUST INCLUDE LAKE ST. CLAIR IN YOUR "RISK ASSESSMENT," WHICH YOU HAVE NOT AND, DON'T FORGET, LAKE ST. CLAIR IS A SOURCE OF DRINKING WATER!

MDEQ, THE "RISK ASSESSMENT" PORTION OF YOUR "STAFF ACTIVITY REPORT" IS REMINISCENT OF THE "TUSKEGEE EXPERIMENT," THE MEDICAL EXPERIMENT CONDUCTED ON BLACK MEN AT THE TUSKEGEE INSTITUTE IN ALABAMA FROM 1932 TO 1972; AND, ASSIGNING US WITH "RISKS" IS NOT WITHIN YOUR JURISDICTION, AS A GOVERNMENT BODY OVER IT'S CITIZENS! THIS IS A VERY IMPORTANT POINT TO BE PURSUED BY ME, IF YOU GRANT CWERLP THEIR PERMIT(S)! THE CWCSA INCINERATOR CAN CLOSE DOWN, INSTEAD!!! R.I.P.!

3. THERE IS UNDUE AND UNEQUAL "CONCERN" BY THE MDEQ OVER THE CONTINUED OPERATION OF THE CWCSA INCINERATOR AT PRESENT STANDARDS, WHILE NO SUCH "CONCERN" HAS BEEN VOICED BY THE MDEQ OVER THE CONTINUED OPERATION OF THE GROSSE POINTES-CLINTON REFUSE DISPOSAL AUTHORITY INCINERATOR, WHICH IS ALSO FUNCTIONING BY THE OLD STANDARDS, AND WHICH IS ALSO IN JEOPARDY OF CLOSING DOWN! WHY ARE WE, IN WAYNE COUNTY, BEING TREATED DIFFERENTLY THAN A FACILITY IN MACOMB COUNTY? COULD THIS "PREJUDICE," (AN OPINION FOR OR AGAINST SOMETHING WITHOUT ADEQUATE BASES), BEING DISPLAYED BY THE MDEQ,

CAMOUFLAGED AS "UNDUE CONCERN FOR US," REALLY BE PREJUDICE FOR RACIAL PREJUDICE'S SAKE, BECAUSE OF THE RACIAL MAKEUP OF WAYNE COUNTY? WHAT "ADEQUATE BASIS" DOES THE MDEQ HAVE FOR BEING MORE CONCERNED ABOUT THE CONTINUED FUNCTIONING OF THE CWCSA INCINERATOR, THAN FOR THE CONTINUED FUNCTIONING OF THE GROSSE POINTES-CLINTON INCINERATOR? MDEQ, PLEASE EXPLAIN YOURSELF!!!!

4. ^{IS} THE MDEQ IS "FEIGNING" IGNORANCE ABOUT WHERE THE INCREASED WASTE CAPACITY FOR THE EXPANDED WASTE-TO-ENERGY INCINERATOR WILL COME FROM! IS IT POSSIBLE, THAT AT THIS LATE DATE, THE MDEQ DOES NOT KNOW THIS? THE MDEQ MUST FIND OUT, AND RECORD IN WRITING, FROM PROJECT MANAGER TOM BARNETT, WHERE THIS INCREASED WASTE CAPACITY WILL COME FROM, (BEFORE ANY PERMIT IS GRANTED), AND MR. BARNETT MUST ANSWER TRUTHFULLY, UNDER PENALTY OF DENIAL OF PERMIT, FOR A FALSE STATEMENT! FOR THE MDEQ TO DO ANY LESS, IS DERELICTION OF DUTY, AT BEST!

WHERE
MY FEARS ABOUT THE INCREASED CAPACITY WILL COME FROM CENTER AROUND ARTICLES WRITTEN BY IVAN HELFMAN, IN THE ROMULUS ROMAN. IN THE DECEMBER 22, 1996 ROMULUS ROMAN, THIS WAS WRITTEN BY MR. HELFMAN, "UNLESS BOTH COMMUNITIES (ROMULUS AND BELLEVILLE) CAN INCREASE COMPOSTING AND RECYCLING (TO 40% OF THEIR WASTE STREAM), THEY WILL BE FORCED TO PAY HUNDREDS OF THOUSANDS OF DOLLARS EXTRA TO INCINERATE," BECAUSE OF JIM MURRAY'S (WCDOE) PROPOSED SOLID WASTE PLAN UPDATE. THIS "PERVERSE" (OBSTINATE IN OPPOSING WHAT IS REASONABLE) PLAN OF MR. MURRAY'S AND THE WCDOE, MUST BE EXPOSED BEFORE ANY PERMIT IS CONSIDERED BY THE MDEQ. I'VE SAID THIS BEFORE, AND I'LL SAY IT AGAIN, "IF WE AREN'T ALLOWED TO USE CARLETON FARMS LANDFILL, WHO WILL USE IT, THE CANADIANS?" OH YES, ANOTHER FINE POINT OF THE REVISED SOLID WASTE MANAGEMENT PLAN IS THAT "...UNDER THE PLAN, CARLETON FARMS CAN'T ACCEPT WASTE FROM COMMUNITIES THAT DON'T RE-

CYCLE (AT THE 40% LEVEL)!" HOW'S THAT FOR PERVERSE! FOR MR. MURRAY TO TELL ROMULUS THAT WE MUST RECYCLE TO AN IMPOSSIBLE LEVEL, 40%, AND THEN TO TELL US IF WE DON'T WE HAVE TO SITE A LANDFILL OR INCINERATE, WHEN WE ALREADY HAVE EXCESS LANDFILL CAPACITY IN OUR AREA (WAYNE COUNTY), AMOUNTS TO "ENVIRONMENTAL HERESY!!!!!" THIS MUST BE EXPLORED BY YOU, MDEQ, BEFORE YOU GRANT ANY PERMIT TO CWERLP!!!! (See article, Romulus Roman, December 22, 1996, enclosed.)

5. ROMULUS PASSED A RESOLUTION THAT OPPOSES THE EXPANSION AND CONTINUED OPERATION OF THE CWCSA INCINERATOR, ON MONDAY, JUNE 2, 1997! AND, EVEN THOUGH THE RESOLUTION PASSED BY A 3-2 VOTE; OF THE TWO COUNCIL MEMBERS ABSENT- GEAR AND RASPBERRY- MR. RANDOLPH GEAR WOULD HAVE VOTED AGAINST THE INCINERATOR! SO, IT STILL WOULD HAVE BEEN A 4-3 VOTE AT BEST, (OR POSSIBLY A 5-3 VOTE, DEPENDING ON MR. RASPBERRY'S VOTE)!

6. THE "SIGNING BONUS" OF \$1 MILLION, TO THE CWCSA AUTHORITY, FROM CWERLP, IS A "SEDUCTIVE" PLOY, AND I WONDER IF ANY OF THIS \$1 MILLION IS FILTERING DOWN TO THE WCDOE? THAT WOULD EXPLAIN WCDOE'S PERVERSE LOGIC IN TRYING TO GET ROMULUS AND BELLEVILLE "SIGNED ON" THROUGH THE REVISED WAYNE COUNTY SOLID WASTE MANAGEMENT PLAN!!!! I WANT THE PROPRIETY OF THE \$1 MILLION "SIGNING BONUS" INVESTIGATED BY YOU, MDEQ, BEFORE ANY PERMIT IS GRANTED!!!! AND, I WOULD LIKE YOU TO HAVE MR. MURRAY, OF THE WCDOE, PUT A STATEMENT IN WRITING, ABOUT WHAT PART ROMULUS AND BELLEVILLE WILL PLAY, (IN THE FUTURE), IN THIS INCINERATOR PROJECT, BEFORE ANY PERMIT IS GRANTED!!!! MDEQ, FIND OUT IF ROMULUS AND BELLEVILLE, ARE ALREADY TARGETED BY MR. MURRAY/WCDOE!!!!

7. AS REGARDS TO "GOOD SCIENCE," THE PROCESS OF "NATURAL SELECTION" IN THE STATE'S FISH POPULATIONS, WILL BE COMPROMISED IF CWERLP

EAB, SEE THIS

IS ALLOWED TO OPERATE!!!!!! **X** WHAT KIND OF "BACKWARDS LOGIC" ALLOWS
CITIZENS TO TAKE, KEEP, AND EAT THE "HEALTHIER" FISH; LEAVING THE
"WEAKER AND SICKER" FISH IN THE LAKE, AS PROCREATORS OF THE NEXT
GENERATIONS OF FISH? THIS COURSE TOTALLY ASKEWS THE PROCESS OF
"NATURAL SELECTION," OR DOESN'T GOV. JOHN ENGLER BELIEVE THAT THIS
 "GOOD SCIENCE" EITHER? I'LL BET, MOST OF THOSE UNION WORKERS THAT
 STOOD UP AT TODAY'S (JULY 29, 1997) HEARING ARE FISHERMEN, ALSO.
 I'LL BET THEY HAVEN'T THOUGHT THIS INCINERATOR THING THOROUGHLY,
 WHEN GIVING CWERLP THEIR BLESSING! I NOTICED THE UNION WORKERS DID
 NOT REMAIN UNTIL THE WEE HOUR OF 12:30 A.M., LIKE THE ENVIRONMENTALISTS
 DID!!! MDEQ, PLEASE STUDY THE EFFECTS OF THE CWERLP INCINERATOR,
 AND WHAT THOSE EFFECTS WILL HAVE ON THE PROCESS OF "NATURAL SELECTION"
 IN THE THREE LAKES MENTIONED IN THE "RISK ASSESSMENT," IN LAKE ST.
 CLAIR, AND IN ALL THE LAKES IN THE STATE OF MICHIGAN!!!!!! BEFORE YOU
 GRANT ANY PERMIT!
 IN CONCLUSION, MDEQ, YOU'RE STEPPING OVER "YOUR AUTHORITY" IN ASSIGNING
 SPECIAL "RISKS" TO US HERE IN WAYNE COUNTY, RISKS THAT WE DON'T WANT!
 (YOU ARE ALSO ASSIGNING SPECIAL "RISKS" TO THE FISH POPULATIONS IN
 OUR STATE; RISKS TO FISH NOT MENTIONED IN YOUR "RISK ASSESSMENT,"
 THEY MUST BE.) REMEMBER WHAT HAPPENED IN TUSKEGEE, AND THE TUSKEGEE
 EXPERIMENT! STOP THE "DEARBORN HEIGHTS EXPERIMENT," NOW!!!!!!!!!! (SAVE
 OUR FISH POPULATIONS, NOW!!!!!!!!!!) D E N Y T H I S P E R M I T!!!!!!!!!!

① encl. 1997 Fish Consumption Advisory.

② encl. article, Romulus Roman December 22, 1996.

③ encl. CWERLP's "Making a Clean Energy Source Cleaner" pg. 10.

④ encl. article, Detroit
 L. R. P. 8-11-97.

(b) (6) Privacy